

WORKERS' COMPENSATION APPEALS BOARD
STATE OF CALIFORNIA

ANISA CHANEY,)	
)	
Applicant,)	
)	
vs.)	CASE NO.: ADJ13521045
)	ADJ13521436
BOLD QUAIL HOLDINGS LLC;)	
AMERICAN HOME ASSURANCE)	
COMPANY INSURED BY)	
AMERICAN ZURICH INSURANCE)	
COMPANY,)	
)	
Defendants.)	
_____)	

DEPOSITION OF ANISA MICHELLE CHANEY
HAWTHORNE, CALIFORNIA
NOVEMBER 13, 2020

REPORTED BY:
LIZA PADILLA
CSR NO. 14014

ANISA MICHELLE CHANEY

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<p>1 WORKERS' COMPENSATION APPEALS BOARD 2 STATE OF CALIFORNIA 3 4 ANISA CHANEY,) 5 Applicant,) 6 vs.) CASE NO.: ADJ13521045 7 BOLD QUAIL HOLDINGS LLC;) 8 COMPANY INSURED BY) 9 COMPANY,) 10 Defendants.) 11 _____) 12 13 Videoconference deposition of ANISA MICHELLE 14 CHANEY, taken on behalf of the Defendant, at 13200 Doty 15 Avenue, Apartment 101, Hawthorne, California, at 2:11 16 p.m., on Friday, November 13, 2020, before Liza Padilla, 17 CSR No. 14014, a Certified Shorthand Reporter within and 18 for the State of California, pursuant to notice. 19 -000- 20 21 22 23 24 25</p>	<p>1 I N D E X 2 W I T N E S S : PAGE 3 ANISA MICHELLE CHANEY 4 Examination by Ms. Khanyan: 5 5 6 INFORMATION REQUESTED: 7 (None) 8 9 QUESTIONS INSTRUCTED NOT TO ANSWER: 10 Page Line 11 63 22 12 13 E X H I B I T S : 14 (None) 15 16 17 18 19 20 21 22 23 24 25</p>
3	5
<p>1 A P P E A R A N C E S : 2 3 For the Applicant: 4 WORKERS' DEFENDERS LAW GROUP 5 By: Natalia Foley, Esq. 6 (Appearing remotely) 7 8018 East Santa Ana Canyon Road 8 Anaheim, California 92808 9 (714) 948-5054 10 nfoleylaw@gmail.com 11 12 For the Defendant American Home Assurance Company: 13 14 FLOYD SKEREN MANUKIAN LANGEVIN, LLP 15 By: Ileen Khanyan, Esq. 16 (Appearing remotely) 17 215 North Marengo Avenue, Suite 201 18 Pasadena, California 91101 19 (626) 316-5720 20 ileen.khanyan@floydskerenlaw.com 21 22 For the Defendant Sedgwick: 23 LAUGHLIN, FALBO, LEVY & MORESI, LLP 24 By: Manuel Garcia, Esq. 25 (Appearing remotely) One Capitol Mall, Suite 400 Sacramento, California 95814 (714) 385-9400 mgarcia@lflm.com</p>	<p>1 HAWTHORNE, CALIFORNIA - FRIDAY, NOVEMBER 13, 2020 2 2:11 p.m. - 5:03 p.m. 3 -000- 4 THE REPORTER: Before we proceed, I will ask counsel 5 to stipulate on the record that, due to the current 6 national emergency, there is no objection to the 7 deposition officer administering a binding oath to the 8 witness remotely. Please state your agreement on the 9 record. 10 MS. KHANYAN: Ileen Khanyan, defense counsel for 11 Zurich, and I stipulate. 12 MS. FOLEY: I'm an applicant attorney, Natalia Foley, 13 for Workers' Defenders. I have no objection. So 14 stipulated. 15 MR. GARCIA: Manny Garcia, for defendant Sedgwick. No 16 objection. 17 *** 18 ANISA MICHELLE CHANEY, having been duly sworn, 19 was examined and testified as follows: 20 *** 21 EXAMINATION 22 BY MS. KHANYAN: 23 Q Good afternoon. I'm the attorney representing 24 the defendant Zurich Insurance with regard to the workers' 25 compensation claim that you filed. I've set this</p>

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<p style="text-align: right;">6</p> <p>1 deposition, but co-defendant's counsel is here as well. 2 I'm sure your attorney has already gone over the 3 ground rules for this deposition, but I'd like to go over 4 them with you so that we're on the same page. Okay? 5 A Yes. 6 Q I'm going to ask you about the facts and 7 circumstances surrounding your workers' compensation 8 claim. 9 You have been sworn under oath today. Do you 10 understand that the oath that you are -- that you are 11 taken under has the same force and effect as if you were 12 testifying before a court of law before a judge? 13 A Yes. 14 Q So even though we're in a very informal setting, 15 in conference rooms and at our homes via Zoom, the rules 16 of penalty and perjury and misrepresentation do still 17 apply, which means, if you fail to tell the truth or 18 misrepresent the facts and we later find out about it, you 19 may be held liable by a court of law subject to fines and 20 possible jail time. 21 Do you understand that? 22 A Yes. 23 Q I'm not here to confuse you or trick you. I'm 24 just here to get the facts and circumstances surrounding 25 your case. So when I ask you a question, if you don't</p>	<p style="text-align: right;">8</p> <p>1 each and every word, it's important you speak loudly, 2 clearly, and give me verbal responses. So "yes" and "no" 3 answers, not "uh-huh," "uh-uh." Don't nod or shake your 4 head. And when you're referring to a body part, please 5 don't point at it because she can't write down what you're 6 pointing at. So just say "left shoulder" or "right 7 shoulder," or if you're saying "back," say "low back." 8 Do you understand? 9 A Yes. 10 Q Excuse me. 11 If you need a break at any time, whether it's to 12 use the restroom, speak to your attorney, or take a break, 13 please let me know, and we will take a break. However, I 14 ask that, if I have a pending question, that you provide 15 me the response first, and then I will provide the break. 16 Understood? 17 A Yes. 18 Q Once the deposition is completed, the questions 19 and answers will be typed into a booklet form. You'll 20 have the opportunity to review your testimony and make any 21 corrections that you feel are necessary. However, I must 22 caution you that, if you do make changes to the deposition 23 booklet, that either me or counsel or any other attorney 24 could comment on it at a later date, which may prove 25 damaging to your case.</p>
<p style="text-align: right;">7</p> <p>1 understand it, please ask me to repeat it. I'll rephrase 2 it. We'll make sure you understand the question. But if 3 you provide me an answer to the question, obviously it's 4 assumed that you understood the question. 5 Do you understand that? 6 A Yes. 7 Q If you can't recall the information in response 8 to my question, please don't guess. We don't want you to 9 guess. You are entitled to saying you don't remember, but 10 I am entitled to your best estimate. 11 So I'm going to give you an example of the 12 difference between an estimate and a guess. Okay? 13 A Yes. 14 Q An estimate, you have personal experience or 15 personal knowledge. If I ask you how tall the door is at 16 your home right now, even if you haven't measured it, you 17 know an estimate if it's six, seven, eight feet tall. But 18 if asked you how tall is the door inside my home right 19 now, you would be guessing because you have no experience, 20 you've never even seen it. 21 Do you understand the difference? 22 A Yes. 23 Q The person who swore you in is the court 24 reporter, and she will be taking down every word that is 25 said during this deposition. Because she is recording</p>	<p style="text-align: right;">9</p> <p>1 Do you understand that? 2 A Yes. 3 Q Have you taken any medication, alcohol, or 4 chemical substance that would impair your ability to give 5 your deposition today? 6 A No. 7 Q Can you please state your full name for the 8 record? 9 A Anisa Michelle Chaney. 10 Q How do you spell Michelle? 11 A M-i-c-h-e-l-l-e. 12 Q Thank you. 13 Can you confirm your date of birth? 14 A September 6th, 1973. 15 Q Have you ever gone or been known by any other 16 name or maiden name? 17 A My married name. My last name is Chaney-Stakely. 18 Q Chaney, hyphen -- 19 A Stakely, S-t-a-k-e-l-y. 20 MR. GARCIA: I'm sorry. Can you spell that again, the 21 last? 22 THE WITNESS: S-t-a-k-e-l-y. 23 MR. GARCIA: Thank you. 24 THE WITNESS: Yes. 25 Q BY MS. KHANYAN: Within the last 24 hours, have</p>

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<p style="text-align: right;">10</p> <p>1 you taken any medication, whether prescribed or 2 over-the-counter? 3 A Yes. 4 Q What medication have you taken? 5 A I've taken Tylenol in the 24 hours. Tylenol, 6 yes. 7 Q Is it prescribed or over-the-counter? 8 A It's over-the-counter. 9 Q Do you know the milligrams, by any chance? 10 A I take about 1,000 milligrams. 11 Q What do you take the Tylenol for? 12 A For pain and discomfort. 13 Q To which body part? 14 A That I took the Tylenol yesterday, last night? I 15 took it for my neck and my lower back. 16 Q How long have you been taking Tylenol? 17 A I use it when I need it for maybe about -- I 18 don't know. Maybe about seven or eight months. 19 Q Here's where estimates come in. You obviously 20 don't remember exactly how many you've taken. 21 A Right. 22 Q So approximately how often do you take it? Like, 23 every day? Every other day? 24 A Almost every day. 25 Q How many tablets do you take?</p>	<p style="text-align: right;">12</p> <p>1 A Yes, it's my leg. My ankle, my knee, my foot, my 2 hip. 3 Q Again, is it both your legs or just the -- 4 A It's mostly my left leg. My left side, yes. 5 Q Got it. 6 Any other medication you've taken in the past 7 24 hours? 8 A No. 9 Q What about in the past seven days? 10 A Yes. I took ativan. 11 Q Do you know the milligrams, by any chance? 12 A 0.5 milligrams. 13 Q When you say you took it in the past seven days, 14 do you remember when the last time was? 15 A Approximately, I think it was Tuesday or 16 Wednesday. I don't recall exactly. 17 MS. KHANYAN: So just let's go off the record for a 18 second. 19 (Off record from 2:22 p.m. to 2:23 p.m.) 20 Q BY MS. KHANYAN: You took it on Tuesday or 21 Wednesday; right? That's what you said? 22 A Yes. 23 Q What do you take the ativan for? 24 A Anxiety. 25 Q Anything else?</p>
<p style="text-align: right;">11</p> <p>1 A From two to four in a day. 2 Q Have you taken it for any other reason aside for 3 neck and lower back? 4 A No. 5 Q So the pain and the discomfort is in the neck and 6 lower back for the past six or seven months? 7 A Part of it, yes. 8 Q What's the other part? 9 A Pain? I'm sorry. Are you asking me about pain? 10 Q Yeah. You said you take Tylenol for the past six 11 or seven or eight months. I'm asking you what other pain 12 or discomfort do you feel aside from the neck and the 13 lower back that you take Tylenol for. 14 A I've taken it for my pain in my arm. I've taken 15 it for a headache. I've taken it for pain in my leg and 16 my knees. 17 Q Perfect. 18 So when you say pain in your arm, which arm are 19 you referring to? 20 A Mostly my left arm. 21 Q Headache. Leg. 22 You said leg. Which leg? 23 A Well, both of my knees hurt but more so my left 24 knee. 25 Q Is it only the knee or the rest of the leg?</p>	<p style="text-align: right;">13</p> <p>1 A No. 2 Q Who prescribed the ativan? 3 A My doctor. 4 Q What's your doctor's name? 5 A My last -- my last prescription of ativan came 6 from -- I can't pronounce his name. 7 MR. GARCIA: Do you have a prescription nearby where 8 you can read it off the label? 9 THE WITNESS: Okay. Hold on one second. 10 MR. GARCIA: Sorry, Ileen. 11 MS. KHANYAN: You're fine. 12 THE WITNESS: I'm sorry. I don't. I actually ran 13 out. I'm getting a refill. I don't -- I don't really 14 know where the bottle is right now. I can get that 15 information to you. 16 Q BY MS. KHANYAN: Okay. So since you're looking 17 for medication right now, I'm going to ask you about all 18 the medication. Get all the bottles. We'll just look at 19 the names of the doctors that prescribed them. 20 A I'm sorry. I didn't know you were going to need 21 those. So I might need a minute to get them. 22 Q Yeah, we can take a break because I also want you 23 to get your driver's license and your health insurance 24 card. So I don't want you to get up fifteen times looking 25 for the stuff. So we can take a quick break. Look for</p>

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14

1 all of your prescriptions, the driver's license, and a
2 health insurance card. Cool?
3 A Okay. I don't have a health insurance card.
4 Q Driver's license and prescription.
5 A Okay.
6 MS. KHANYAN: Let's go off the record for a minute or
7 two.
8 (Off record from 2:26 p.m. to 2:32 p.m.)
9 Q BY MS. KHANYAN: You weren't able to find your
10 medication; correct?
11 A I did find a medication. I don't have the
12 doctor. I didn't see the doctor's name on here.
13 Q Can you hold it up, please?
14 A Oh, sure.
15 Q It might be blurry but worth a try.
16 So it's lorazepam?
17 A Yes.
18 Q 5-milligram.
19 I see it's to you, but I don't see a doctor's
20 name either.
21 A Yeah, I don't.
22 Q All right. That's fine.
23 Do you know the doctor's first name? Maybe
24 that's easier to pronounce than the last.
25 A I believe his name was Michael that prescribed

15

1 this one.
2 Q Do you remember the first letter of his last
3 name?
4 A It's an "n." It's a really hard name.
5 Q That's fine.
6 Do you know where he's located, like city?
7 A Culver City.
8 Q Is he a psychiatrist? a psychologist?
9 A Psychiatrist.
10 MR. GARCIA: What's the name of his facility or
11 clinic?
12 THE WITNESS: I'm not sure. I can get that
13 information later. I need to look at it and see.
14 Q BY MS. KHANYAN: That's fine.
15 I'm just going to try one name. I have a
16 Dr. Michael Kamiel. It's Culver City. Psych?
17 A No.
18 Q Doesn't sound familiar?
19 How about Dr. Michael Tolwin?
20 A No.
21 Q So then we'll just have you provide us the name.
22 I'll request the information from your attorney. All
23 right?
24 A Okay. Please.
25 Q How long have you been taking the ativan?

16

1 A I was prescribed it, I believe, back in May.
2 Q May of 2020?
3 A Yes.
4 Q And it was by this Dr. N.?
5 A No.
6 Q Who was it first prescribed by?
7 A That information, I would have to get. It was an
8 urgent care doctor.
9 Q Do you recall the urgent care you were at?
10 A Long Beach Urgent Care -- Behavioral Urgent Care.
11 Q So Long Beach Urgent Care?
12 A Yes. I'm not sure of the exact name, but it's in
13 Long Beach.
14 Q Do you recall the cross streets or where the
15 facility was near, like a mall?
16 A No. It's not -- it's on Long Beach Boulevard and
17 -- Long Beach Boulevard and --
18 Q I have -- according to Google, there's a -- you
19 might not remember the exact address. It's 4200 Long
20 Beach, No. 150, in Long Beach, California.
21 A No. It's a facility. It's an urgent care
22 facility.
23 Q Yeah. It's Long Beach Urgent Care on Long Beach,
24 CA-1.
25 A No.

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1 Q But it's on Long Beach Boulevard, you said?
2 A Yes.
3 Q All right. If I can't find it myself, I'll
4 request your attorney to provide it to me when you
5 remember the address.
6 A Yes.
7 And I have it documented. I have the paperwork.
8 I just didn't know I needed it.
9 Q When did you go to that Long Beach urgent care?
10 A I went in May.
11 Q Then when did you --
12 A In May. I'm sure -- I'm kind of -- yes, I'm sure
13 it was May.
14 Q Okay. And when did you start treating with
15 Dr. Michael N.?
16 A I saw him in July.
17 Q The first time was in July of 2020?
18 A Yes.
19 Q Do you still treat with Michael N.?
20 A Due to insurance, I'm not able to see the doctor.
21 Q So you only saw him one time?
22 A Yes. And then I lost my insurance.
23 Q Got it.
24 You saw him one time in July, and then you lost
25 insurance, and you're not seeing him anymore.

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<p style="text-align: right;">18</p> <p>1 A Well, I plan to see him, but I haven't seen him. 2 Q Do you have any appointments scheduled? 3 A They're pending. Insurance. 4 Q Got it. 5 Any other medication, aside from the Tylenol and 6 ativan, in the past thirty days? Let's go back now. 7 A Thirty days? No. 8 Q Do you have your California driver's license? I 9 told you to get that. Do you have that? 10 A Yes. 11 Q Can you please hold that up so I can confirm it's 12 your photo since I've never met you? 13 I see it. It's Anisa Chaney. 14 Since it's kind of blurry, I'm going to ask you 15 to read back the information. 16 So let's start with the -- you can stop holding 17 it up. 18 A Okay. Sorry. 19 Q No, you're fine. 20 So I'm going to ask you what to read off. Okay? 21 A Mm-hmm. 22 Q Can you read the full name it's issued to? 23 A The way it's on here? 24 Q Yes, please. 25 A Chaney-Stakely, Anisa Michelle.</p>	<p style="text-align: right;">20</p> <p>1 security number? 2 A No. 3 Q How much time do you estimate you spent preparing 4 for this deposition with your attorney? 5 A Repeat the question. 6 Q How much time did you spend preparing for this 7 deposition with your attorney? 8 A I spoke with her approximately about an hour. 9 Q Where were you born? 10 A California. 11 Q What is your current address? 12 A 13200 Doty Avenue, Apartment 101, Hawthorne, 13 California 90250. 14 Q Is this the same address listed on your 15 California driver's license? 16 A Actually, my PO Box is on my driver's license. 17 Yes. 18 Q Can we have the PO Box, please? 19 A PO Box 1274, Gardena, California 90249. 20 Q Is there any reason why you have your PO Box 21 listed instead of your current home address? 22 A I don't prefer to receive mail here where I live. 23 Q How long have you been living at your current 24 residence? 25 A About three and a half years.</p>
<p style="text-align: right;">19</p> <p>1 Q What is the driver's license number? 2 A It's A, like "apple," 8383623. 3 Q When was it issued? 4 A Does it say that? 5 Q Yeah. I think it says issue date and expiration 6 date. 7 A I see expiration date and my date of birth. 8 Q All right. Let's get expiration for now. 9 A Maybe issue is on September 11, 2019. 10 Q Perfect. 11 Expiration? 12 A It's 9/6/2024. 13 Q Then can I have your height and the weight listed 14 on there? 15 A Five-two, 130 pounds. 16 Q Do you have any restrictions on there? 17 Did you hear my question? 18 A I said "no." 19 Q Okay. I would like to confirm your social 20 security number off the record, please. 21 (Off record from 2:40 p.m. to 2:40 p.m.) 22 Q BY MS. KHANYAN: Was your social security number 23 issued to you by the U.S. government? 24 A Yes. 25 Q Have you used or presented any other social</p>	<p style="text-align: right;">21</p> <p>1 Q Who do you reside with? 2 A My children and sometimes my brother. 3 Q How old are your children? How many children do 4 you have? 5 A I have two. My daughter is 27; my son, 14. 6 Q Can I get the 27-year-old's name, please? 7 A Her name is Taylor. Her last name is -- 8 Q I was going to ask for her last name. 9 A Chaney. 10 Q Then what's your brother's name? 11 A My brother? 12 Q Yes. 13 A Anthony. Chaney, also. 14 Q Aside from your two children and your brother, 15 has anybody -- does anybody else live there? 16 A No. 17 Q Has anybody moved in or out within the past year? 18 A No. 19 Q Do you pay rent or mortgage? 20 A Yes. 21 Q How much is your rent? 22 A My rent is 1,685. 23 I'm just kind of concerned what is that question 24 about. 25 Q When we do depositions, we're entitled to</p>

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<p style="text-align: right;">22</p> <p>1 everything, like your background. We get the driver's 2 license, your living situation, payment, how much you pay 3 rent, utilities, and then we move on to your source of 4 income. We're basically entitled to your background. 5 A Okay. Sure. 6 Q So you paid 1,685 per month for rent; correct? 7 A Yes. 8 Q How many bedrooms is it? 9 A Two bedrooms. 10 Q Does your daughter and/or your brother contribute 11 to the rent? 12 A Yes. 13 Q How much do they contribute? 14 A About \$500. 15 Q Each? 16 A No. Together. 17 Q The remainder, you pay? 18 A Yes. 19 Q How about utility bills? Here is another 20 approximation. How much do you spend on your utility 21 bills or household expenses per month? 22 A Household expenses includes what? 23 Q Like, shopping for groceries. 24 A And my utility bills? 25 Q Yes.</p>	<p style="text-align: right;">24</p> <p>1 A It's 3311 West 139th Street, Apartment No. A, 2 Hawthorne 90250. 3 Q Who did you live there with? 4 A My husband and my children. 5 Q How long did you live there? 6 A About eighteen years. 7 Q And you were renting? 8 A Yes. 9 Q Just to clarify, your husband doesn't live with 10 you at your current address? 11 A No, he does not. 12 Q Any reason? 13 A Because we're separated. 14 Q You're not divorced? 15 A No. 16 Q That leads into my next question. 17 So you are presently married. 18 A Yes. 19 Q How long have you been married? 20 A About twenty years. 21 Q Did you have any prior marriages aside from 22 Mr. Tyrone? 23 Sorry. You cut off. 24 A No. 25 Q Do you have any other children, like</p>
<p style="text-align: right;">23</p> <p>1 A Maybe about 700. 2 Q Where did you live before your current address? 3 A I lived at 14 -- I don't remember the address 4 14404 Budlong. 5 Q How do you spell that? 6 A It's B, like "boy," -u-d-l-o-n-g. Budlong, 7 mm-hmm. 8 Q What city is that in? 9 A I'm sorry. That's in Gardena, California 90249. 10 Q Was it a home or apartment? 11 A It was Apartment No. 3. 12 Q How long did you live there? 13 A Only about -- maybe about a year and a half. 14 Q Who did you live with? 15 A My husband and my children. 16 Q What is your husband's name? 17 A Tyrone Stakely. 18 Q Spell that for me. 19 A Tyrone, T-y-r-o-n-e, Stakely, S-t-a-k-e-l-y. 20 Q How old is your husband? 21 A He's 58. 22 Q What does he do for a living? 23 A He's a youth counselor. 24 Q How about the address prior to that one? Do you 25 remember that?</p>	<p style="text-align: right;">25</p> <p>1 stepchildren? 2 A Well, yes, my husband has other children. 3 Q How many stepchildren does that make? 4 A It makes four. 5 Q So four stepchildren and then two of your own; 6 right? 7 A Yes. 8 Q Did you ever live with the four stepchildren? 9 A No. 10 Q Do you have a relationship with them? 11 A Yes. 12 Q Good relationship? 13 A Yes. 14 Q Do you have any dependents? 15 A Yes. I have my son. 16 Q Aside from your son? 17 A No. 18 Q Earlier you testified you don't currently have 19 health insurance; correct? 20 A Correct. 21 Q When was the last time you had health insurance? 22 A July 31st. 23 Q 2020? 24 A 2020, yes. 25 Q What health insurance were you with?</p>

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1 A Aetna.
2 Q Was that private or through the employer?
3 A Employer.
4 Q Do you still have the card?
5 A Yes.
6 Q Could you read out the number on the Aetna card,
7 the ID number?
8 And if you need to take a quick break, that's
9 fine.
10 A What do I do to take a break? Can you help me
11 with that?
12 MR. GARCIA: Just say it.
13 Q BY MS. KHANYAN: You just say it. Be like, "I
14 need to get it, please. Quick break."
15 A And then just walk away from the computer?
16 Q Yeah. When we go off, you can walk away from the
17 computer. So the court reporter will say, "Off record,"
18 and then you can go ahead.
19 A Okay. All right. Good.
20 MS. KHANYAN: We're off record.
21 (Off record from 2:50 p.m. to 2:51 p.m.)
22 Q BY MS. KHANYAN: So you have your health
23 insurance card, the old one?
24 A Yes.
25 MS. KHANYAN: Actually, hold it up. Perfect.

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1 Let the record reflect applicant is holding up an
2 Aetna card, and it's actually clear so I can write it
3 myself. It's W257360453.
4 Thank you.
5 THE WITNESS: Okay.
6 Q BY MS. KHANYAN: When you say it was through your
7 employer, which employer are you referring to?
8 A Playa del Rey Center.
9 Q Sorry. I didn't get a response. I don't know if
10 you cut off.
11 A I'm sorry. Do you hear me?
12 Q Yes.
13 Which employer were you referring to?
14 A Playa del Rey Center.
15 Q When you were employed with Playa del Rey, did
16 you have any private health insurance?
17 A No.
18 Q Have you had any other health insurance?
19 A No.
20 Q Have you ever used your husband's health
21 insurance?
22 A No.
23 Q How long have you been separated?
24 A About three years.
25 Q Why did you guys separate?

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1 A I don't -- I don't know how to answer that
2 question.
3 Q I'll give examples.
4 Not getting along? There was arguments? What's
5 the reasoning for your separation?
6 A Irreconcilable differences.
7 Q Any reasons why you haven't filed for divorce?
8 A No. No.
9 Q Do you plan on getting back with him?
10 A I don't know.
11 Q Do you guys get along?
12 A Yeah. Yes.
13 I'm sorry. I'm getting anxiety now. It's not
14 you.
15 Q I'm sorry. If that topic is what causes your
16 anxiety, we'll --
17 A No, it's not that. It's just the questioning, I
18 guess.
19 Q Do you want to take a brief break?
20 A No, no. I'm fine.
21 Q All right. Remember, you can ask me for a break.
22 Once you answer my question, we'll take a break if you
23 need a break. Okay?
24 A Yeah. Sure.
25 MR. GARCIA: Just really quick, going back to your

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1 health insurance, was that an HMO or a PPO?
2 THE WITNESS: PPO.
3 MR. GARCIA: And who was your primary care doctor at
4 that PPO?
5 THE WITNESS: Well, the last year that I had the Aetna
6 insurance, my doctor has always been Dr. Hernandez,
7 Valentine Hernandez. I had --
8 MR. GARCIA: What's his first name or her first name?
9 THE WITNESS: Valentine Hernandez.
10 MR. GARCIA: Where is this doctor at?
11 THE WITNESS: Hawthorne.
12 MR. GARCIA: And how long have you been seeing
13 Dr. Hernandez?
14 THE WITNESS: Twenty years.
15 MR. GARCIA: Okay. Twenty years.
16 THE WITNESS: Mm-hmm.
17 MR. GARCIA: I'm sure over those twenty years
18 Dr. Hernandez has sent you out to different facilities or
19 clinics or different places.
20 THE WITNESS: Sure.
21 Q BY MS. KHANYAN: So you were saying that you --
22 the last year, did you change your PCP?
23 A I changed my insurance. I had changed to Kaiser.
24 Q So you did have Kaiser at one point?
25 A Yes. For a year.

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<p style="text-align: right;">30</p> <p>1 Q Which year was that? 2 A 2018, I think. 3 Q Do you have the old Kaiser insurance card? 4 A No. 5 Q Which Kaiser did you treat at? 6 A Gardena. 7 Q Did you treat at any other Kaiser? 8 A And it was only for like one year and then you 9 went back to Aetna? 10 A Yes. 11 Q Can you tell me all the doctors you've seen for 12 your injuries? Let's start from the beginning. 13 A So you've said Valentine Hernandez is your 14 primary care. 15 A Yes. 16 Q Now talk about the work-related injuries. You've 17 probably seen more than one. Let's start from the first 18 doctor you've seen until the present doctor. Does that 19 sound easier? 20 A Okay. Dr. Hernandez. 21 Q The other doctors, I don't know their names. 22 A That would be the information I would be getting to you. 23 Q Let's try facilities. 24 A So Hernandez, we know she was in Hawthorne. 25 A So you treated with your primary care physician</p>	<p style="text-align: right;">32</p> <p>1 A Yes. 2 Q When did you go to Dusk to Dawn? 3 A This was in June maybe. About June. 4 Q 2020? 5 A Yes. 6 Q Going back to the urgent care where you saw -- 7 you don't remember the urgent care, but you said you saw a 8 psychiatrist for stress; right? 9 A Yes. 10 Q Do you remember the urgent care facility name, 11 like the name? 12 A That's the one on Long Beach Boulevard. 13 Q Got it. 14 A And that was in May 2020; right? 15 A I believe so. 16 Q Any other doctors that you've seen? 17 A I've seen Dr. Gofnung in Los Angeles, and I saw 18 Dr. Daldalyan. 19 Q Can you spell the last one, Dr. Daldalyan? 20 A D-a-l-d-a-l-y-a-n. 21 Q Do you know where Dr. Daldalyan is located? 22 A He's in Reseda. 23 Q Is it on Vanowen? 24 A Yes, Vanowen. 25 Q I'm going to butcher his name. Dr. Gofnung,</p>
<p style="text-align: right;">31</p> <p>1 for your work injuries? Is that what you're saying? 2 A I treated -- I want to say I was maybe evaluated 3 by my doctor, yes, and he treated me with medication. He 4 gave me medicine, maybe pain medicine. So yes. 5 Q For the work injuries; right? 6 A Yes. 7 Q So after -- 8 A Yes, for -- right, for my complaints. For my 9 inquiries about my discomfort, my injuries. Mm-hmm. 10 Q And you said the other doctors that you've seen 11 for your work injuries, you don't remember their names? 12 A Another doctor I have seen is -- it was an urgent 13 care for stress, more than injury. It was for stress. 14 A The psychiatrist. 15 A And also I visited Dusk to Dawn Urgent Care. 16 Q Can you repeat that again? Dusk to Dawn? 17 A Yes. That's also an urgent care. 18 Q Is that in Long Beach? 19 A Is it in Long Beach or Cerritos? 20 Q I have Inglewood, and then there's one in 21 Montebello or Lynwood. Which one would it be? 22 A It's not either. You said Inglewood. No. I 23 want to think it's Long Beach. 24 A I can get that information to you, though. 25 Q Dusk to Dawn; right?</p>	<p style="text-align: right;">33</p> <p>1 right, you said? 2 A Yes. 3 Q Where is he located? 4 A Los Angeles. 5 Q When's the first time you saw Dr. Gofnung? 6 A The first time? Maybe late September. 7 Q 2020? 8 A Yes. 9 Q When you said you went -- so I got that you went 10 to the urgent care in Long Beach for psych May 2020. 11 A What did you present at Dusk to Dawn for in 12 June 2020? What were your complaints then? 13 A I was having chest pain, shortness of breath. I 14 was having headaches. I believe that's what I went for. 15 Q Then when is the first time you saw 16 Dr. Daldalyan? 17 A I just saw him just this week on Monday 9th. 18 Q What did you see him for? 19 A For my symptoms that I haven't been able to 20 follow up on. Yeah, I haven't been able to get back to my 21 doctor with no insurance. So I'm just now being able to 22 follow up again for stress, for my stomach, my -- what do 23 I want to say? -- my gastrointestinal. 24 A I'm a nurse. I don't want to say the wrong 25 things too.</p>

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<p style="text-align: right;">34</p> <p>1 So, yeah, my stomach and my bowels and my 2 headaches and my anxiety symptoms. 3 Q So no orthopedic for Dr. Daldalyan? 4 A He evaluated, yes. 5 Q So you complained of orthopedic pain to him as 6 well? 7 A Yes. I only wanted to take Tylenol. He was 8 going to give me pain medicine. But just Tylenol is okay. 9 So I have to do only Tylenol. 10 Q My question was did you complain about orthopedic 11 body parts to this doctor? 12 A Yes. 13 Q Other than the ones that you've already 14 mentioned, can you name me all your doctors that you've 15 seen in the past ten years? I know you said you were with 16 Dr. Hernandez for twenty years. 17 So I'm assuming most of the time you saw 18 Dr. Hernandez. 19 A Yes. 20 Q Any other clinics or doctors that you would see 21 in the past twelve years? 22 A No, other than Kaiser when I was with them for 23 the year. 24 Q So it would be either Dr. Hernandez or Kaiser for 25 one year?</p>	<p style="text-align: right;">36</p> <p>1 MS. KHANYAN: Of course. 2 (Recess from 3:05 p.m. to 3:11 p.m.) 3 Q BY MS. KHANYAN: You said you've been receiving 4 EDD since your termination on July 6th. Have you tried to 5 look for other employment since then? 6 A Yes. 7 Q Have you been applying? 8 A Yes. 9 Q You haven't found any? 10 A No. 11 Q Okay. When were you hired with Playa? 12 A April 2010. 13 Q What was your position? 14 A RN supervisor. 15 Q That was your position the entirety of your 16 career there? 17 A That's what it was supposed to be. 18 Q What do you mean by that? 19 A I mean I worked in every area. 20 Q Got it. 21 But on your records, you were RN supervisor? 22 A Yes. 23 Q What was your salary at the last day, at the time 24 of your termination? 25 A \$39 an hour. That's all I can tell you.</p>
<p style="text-align: right;">35</p> <p>1 A Right. 2 Q Why did you change to Kaiser for that year? Any 3 reason? 4 A No particular reason. 5 Q That was private; right? Not through your 6 employer? 7 A It was through my employer. 8 Q The employer changed from Aetna to Kaiser? 9 A It's an option. 10 Q What is your current source of income? 11 A Currently, I receive unemployment. 12 Q Unemployment through EDD? 13 A Yes. 14 Q How much do you receive? 15 A About \$3,000 a month. 16 Q Since when have you been getting EDD? 17 A Since I was terminated. 18 Q Do you know your termination date? 19 A July 6th. 20 Q Excuse me? 21 A July 6th. 22 Q July 6th, 2020. 23 A Yes. 24 MS. FOLEY: I apologize. Can I get a five-minute 25 break, please?</p>	<p style="text-align: right;">37</p> <p>1 Q And then who was your supervisor? 2 A May Young. 3 Q M-a-e or M-e-i? 4 A M-a-e. 5 Q Young is spelled the way it sounds, "young"? 6 A Yes. 7 Q What were your job duties as an RN supervisor? 8 A What my duties were to be or what I did? 9 Q What you did. 10 A I supervised the staff, the LVNs, the CNAs. I 11 maintained the building integrity. During my shift, I was 12 the night shift supervisor. I did patient care, med pass. 13 I did housekeeping. 14 Q Can you tell me your physical requirements? 15 A Lifting, pushing a med cart. Assisting patients 16 with mobility, with transfers. 17 Q What was your shift? 18 A Primarily, 11:00 to 7:00. 19 Q 11:00 p.m. to 7:00 a.m. 20 A Yes. 21 Q How many days a week did you work? 22 A Before I left, five. At least five. 23 Q At the time of your termination, were you working 24 on restriction or full duty? 25 A Full duty.</p>

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<p style="text-align: right;">38</p> <p>1 Q While working for Playa, did you have concurrent 2 employment? 3 A Yes. 4 Q Who did you work for? 5 A My Life Foundation. 6 Q How long did you work for My Life Foundation? 7 A Ten plus years. 8 Q Can you tell me the years? 9 A At least ten. More than. Yeah, ten years. 10 2009. 11 Q Approximately 2009? 12 A Yes. 13 Q What was your position there? 14 A I was a nurse consultant. 15 Q What were your duties as a nurse consultant? 16 A I would assess and consult with the staff and the 17 clients with the foundation in their homes, in-home care 18 visits. 19 Q So you did home care visits; right? 20 A Yes. 21 Q Did you do patient care? 22 A Primarily. Patient care? No. Well, patient 23 care? Not physical patient care, no. 24 Q So what were your physical requirements for that 25 job?</p>	<p style="text-align: right;">40</p> <p>1 assignment? Is that how you got paid? Were you paid per 2 hour or salary? How were you paid? 3 THE WITNESS: I was paid -- I guess you would say per 4 diem. 5 MR. GARCIA: So like per assignment? Like, you went 6 to this house and you got paid for that assignment? 7 THE WITNESS: Yes. 8 MR. GARCIA: Next you went to another house and you 9 got paid for that assignment? 10 THE WITNESS: Yes. 11 MR. GARCIA: So they would call you when they would 12 have an assignment, and you would go to that particular 13 house to assess? 14 THE WITNESS: I would regularly monitor the houses. 15 MR. GARCIA: Okay. 16 Q BY MS. KHANYAN: So you were per diem at My Life. 17 What about at Playa? When you got your 18 paychecks, who was it from? Was it Playa or something 19 else? 20 A Well, it's been several different things during 21 my time there. 22 Q Okay. Let's go to the last year. Who was your 23 employer? 24 A It was Genesis HealthCare and New Gen. They were 25 transitioning to New Gen, a company called New Gen. I</p>
<p style="text-align: right;">39</p> <p>1 A No physical. 2 Q And then why did you stop working there? 3 A Because I was exposed to COVID at Playa del Rey 4 and I couldn't cross -- I was being exposed to COVID daily 5 at Playa. So I couldn't work anywhere after leaving 6 there. 7 Q So did you quit, or did they terminate you 8 because of -- 9 A No. No. 10 Q What happened? 11 A I haven't went back since with the pandemic. 12 Yeah. 13 Q Oh. So the company closed? You didn't separate? 14 A The company is not closed. 15 Q So my question is were you terminated or did you 16 quit? 17 A Neither. But I didn't -- I couldn't go because I 18 was -- I was being exposed to COVID at Playa daily. So I 19 couldn't leave a job and go to a patient's house not 20 knowing my status. So I didn't quit or I wasn't fired, 21 but I just couldn't go. 22 MR. GARCIA: How did you get your assignments for My 23 Life Foundation? 24 THE WITNESS: How did I get them? 25 MR. GARCIA: I mean were you per diem, like per</p>	<p style="text-align: right;">41</p> <p>1 guess a private company. I really don't know. 2 Q So when you get your paychecks, it would change? 3 Sometimes it would be Genesis Health or Playa del Rey 4 Center? 5 A It was Genesis, and then it changed to -- let me 6 think. Genesis HealthCare and then it changed to -- 7 sorry. 8 MR. GARCIA: Well, you say it changed names, but was 9 the building always called the same? It was just the 10 ownership different? 11 THE WITNESS: It's always been Playa del Rey Center, 12 but the -- 13 MR. GARCIA: The owners have changed? 14 THE WITNESS: Yes. 15 Q BY MS. KHANYAN: Were your duties assigned to 16 you, like, by the supervisors at Playa del Rey Center or 17 agency? That's what I'm trying to get to at the end of 18 the day. 19 A An agency? I'm sorry. And I don't see anything 20 with their name on it. 21 My duties were assigned by Playa del Rey Center. 22 Q When you were doing the job for My Life 23 Foundation, again, were you working full duty or on 24 restriction? 25 A No restrictions.</p>

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1 MR. GARCIA: I'm sorry. My Life Foundation, where is
2 that at?
3 THE WITNESS: In Los Angeles.
4 Q BY MS. KHANYAN: Is it on La Tijera?
5 A La Tijera, yes.
6 Q So the last time you worked for them was
7 approximately when?
8 A April 1st was my last day.
9 Q April 1st, 2020; correct?
10 A Yes.
11 Q Before working at Playa del Rey Center, and not
12 counting the concurrent employment, where did you work
13 before? Previous employer.
14 A I was self-employed, and I worked for IHSS,
15 In-Home Support Services.
16 Q So let's start with self-employed. What were you
17 doing? Did you have your own business?
18 A Cosmetologist.
19 Q Do you have a cosmetologist license?
20 A Yes, ma'am.
21 Q Are you still an active member of the Board of
22 Cosmetology?
23 A Yes, ma'am.
24 Q How long have you been doing cosmetology?
25 A Forever. All my life. Thirty years, maybe.

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1 Q So do you have clients come to your house, or do
2 you have a shop?
3 A Presently?
4 Q Oh, it's presently? Are you still doing it?
5 A No.
6 Q When is the last time you were doing cosmetology?
7 A Last year, 2019.
8 Q Approximate month? Do you remember?
9 A Maybe early -- maybe 2019. This is 2020. Maybe
10 approximately the beginning of 2019 was the last.
11 Q You were doing it at home?
12 A Yes. Uh-huh. Or at my client's home. At that
13 time, yes.
14 Q Were you doing this -- just to get a picture of
15 this, you were doing -- working as an RN supervisor five
16 days a week. And how many days a week would you say you
17 were at My Life Foundation?
18 A Two to three times a week, a couple hours a day.
19 Q When you say "a couple hours," can I have an
20 estimate, please?
21 A About two to four hours, two to three times a
22 week.
23 Q Then what about the cosmetology? Would you do it
24 on weekends, or how would that work?
25 A Yes, spare time.

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1 You're speaking about in 2018, '19? The last
2 time I was doing cosmetology.
3 Q Let's talk about the last five years.
4 You said you were doing cosmetology until 2019;
5 right?
6 A Yes.
7 Q So how often were you doing makeup?
8 A Hair.
9 Just on the weekends, yes. And I say it was the
10 weekend, but it might have been a weekday.
11 Q A nurse life.
12 A Yes.
13 Q Per week, approximately how much makeup were you
14 doing or hair?
15 A When you say "how much," how do I weigh that?
16 Q How many clients would you see?
17 A Just like two in a week.
18 Q Now, going to the IHSS, when were you with --
19 when were you employed with IHSS?
20 A Probably from -- I'm not exactly sure, and it was
21 kind off and on. So anywhere from 1990 -- maybe from --
22 let's just say from 2000.
23 Q So off and on from 1990 to 2000, approximately?
24 A No. I'm saying from 2000 until -- about 1990 to
25 2010. That's better.

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1 Q Got it.
2 Which IHSS location were you working with?
3 A You want to know the office?
4 Q Yes.
5 A I believe I ended up in the Hawthorne office. I
6 could have started in Los Angeles.
7 Q And between from 1990 to 2010 -- because you did
8 it on and off, let's just focus on the last five years.
9 How many patients were you seeing?
10 A Just one. Maybe two.
11 Q So I've had several witnesses do IHSS where they
12 bounce around from different patients or they stick to one
13 or two. It sounds like you would just stick to one or two
14 patients.
15 A For as long as the case would allow it.
16 Q Got it.
17 What was wrong with these patients? What were
18 your duties?
19 A It varied. Maybe I did grocery shopping and
20 light housekeeping, laundry. Maybe a patient -- I would
21 assist with their personal care. Yes, drive them to
22 doctor's appointments and other appointments and so forth
23 like that.
24 Q Do you remember the last patient you took care
25 of, by any chance, the name of the last patient?

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<p style="text-align: right;">46</p> <p>1 A Billy Fletcher. 2 Q Did you have to drive Billy to his doctor's 3 appointment? 4 A Yes. 5 Q Did you do his laundry? 6 A Yes. 7 Q How long were you with Billy? 8 A For a while. Maybe about two years or more. It 9 could have been, yes. 10 Q What was his physical limitation? 11 A He was limited. He walked with braces. He was 12 ambulatory, but he walked with his braces. He needed 13 assistance. But he was partially independent. 14 Q Did you have to bathe him? 15 A No. 16 Q Did you have to help him get in and out of bed? 17 A No. 18 Q How about dressing himself? 19 A I would have to assist him. 20 Q So you never would have to help him lift him in 21 any way? 22 A No. 23 Q Did you ever sustain any injuries while you were 24 working for My Life Foundation? 25 A No.</p>	<p style="text-align: right;">48</p> <p>1 equipment? 2 THE WITNESS: No, no. 3 MR. GARCIA: No equipment at all? 4 THE WITNESS: No. 5 Q BY MS. KHANYAN: What about when you're doing 6 makeup? Would you have to carry all your makeup and hair 7 supplies? 8 A I have a small bag that I carry, yes. 9 Q Just to make sure, because I know cosmetologists 10 do both, do you do hair or makeup? 11 A Hair. Basically, hair. Primarily. 12 Q So would you carry your blow dryers, your irons, 13 and stuff to your clients' houses? 14 A No. Actually, during this time, I practiced 15 braiding and weaving. So I didn't need all that. 16 Q And that bag you say you carried, how much did it 17 approximately weigh? 18 A Maybe about 10 or 15 pounds. 19 Q Can you tell me what your current complaints are? 20 MR. GARCIA: Wait. Before we start there, can I go 21 back a little bit earlier? 22 MS. KHANYAN: Yes. 23 MR. GARCIA: You stated you're receiving unemployment; 24 right? 25 THE WITNESS: Yes.</p>
<p style="text-align: right;">47</p> <p>1 Q You never filed a claim with them? Did you 2 sustain any injuries while you were doing cosmetology in 3 all those years? 4 A No. 5 Q What about with IHSS? 6 A No injuries. 7 Q Did you feel any discomfort while working for 8 IHSS in your low back? 9 A No. 10 Q What about your legs? 11 A No. 12 Q And the same question applies to while you were 13 working at My Life Foundation. Did you feel any 14 discomfort in your low back? 15 A Well, the jobs ran concurrent. So, yes, I did. 16 But I didn't work physically at My Life Foundation. 17 Q When you were driving -- you said you were 18 driving to patients' homes? 19 A Yes. 20 Q Approximately how long were these drives? 21 A Maybe about 20, 30 minutes. 22 Q So they were in your neighborhood most of the 23 time? 24 A Basically, yes. 25 MR. GARCIA: Would you ever have to carry any</p>	<p style="text-align: right;">49</p> <p>1 MR. GARCIA: So is it every two weeks, every month you 2 get it certified? That way you keep getting it; right? 3 You have to sign a document; is that right? 4 THE WITNESS: Yes. Yes. 5 MR. GARCIA: Is it every two weeks, or is it once a 6 month? 7 THE WITNESS: It's every two weeks. 8 MR. GARCIA: And I think they ask you in that 9 questionnaire, "Are you able to work?" Correct? 10 THE WITNESS: Yes. 11 MR. GARCIA: And you put down "yes"? 12 THE WITNESS: Yes. 13 MR. GARCIA: And then you signed it; right? 14 THE WITNESS: Yes. 15 MR. GARCIA: So when you signed that document that you 16 were able to work, you're being truthful? 17 THE WITNESS: Yes. 18 MR. GARCIA: So you also said earlier that you're 19 applying for jobs; right? 20 THE WITNESS: Yes. 21 MR. GARCIA: What kind of jobs are you applying for? 22 THE WITNESS: I have been seeking out less physical 23 positions. 24 MR. GARCIA: Where have you applied at? Like, what 25 companies, what locations?</p>

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<p style="text-align: right;">50</p> <p>1 THE WITNESS: I applied to several. 2 (Technical interruption.) 3 MR. GARCIA: You froze. 4 THE WITNESS: Department of Veteran Affairs. I've 5 applied for school nurse. I've applied for -- what do I 6 want to call it? 7 MR. GARCIA: Let me ask you this -- 8 THE WITNESS: Coding nurse. 9 MR. GARCIA: Have you got any interviews yet? 10 THE WITNESS: No interviews. Well, I have spoken 11 to -- over the phone, I've had meetings but no formal 12 interview. 13 MR. GARCIA: These applications -- and obviously I 14 haven't seen them. But these applications that you're 15 filling out, do you they ask you if you have any 16 restrictions of any kind? 17 THE WITNESS: No. 18 MR. GARCIA: Okay. One more before we continue on. 19 When did you become an RN? 20 THE WITNESS: I received my RN license in 2009. 21 MR. GARCIA: 2009, okay. 22 Go ahead, Ileen. 23 Q BY MS. KHANYAN: As follow-up on that, when you 24 received your RN license in 2009, the first RN position 25 you got was with Playa del Rey Center, or did you work</p>	<p style="text-align: right;">52</p> <p>1 Q Aside from your neck -- or let's start with your 2 neck. What part of your neck are you referring to? The 3 whole neck? The left side? The right side? 4 A It's more so on my left side. Sometimes it goes 5 from my jaw down my neck, shoulder, arm, down to my 6 fingers. 7 Q Okay. So you would say the pain starts from the 8 left side of your neck and you feel it radiating down to 9 your shoulder? Or do you feel like the shoulder pain is 10 separate from your neck? 11 A Just like it all goes together. 12 Q Do you feel it start at the neck, though, and 13 then go down? 14 A Yeah. 15 Q Currently, on an scale of 1 to 10, 10 being the 16 worst, what would you rate your neck pain? 17 A Right this moment? 18 Q Yeah. 19 A It's annoying. Maybe about a 4 or a 5. Maybe 20 about a 4. 21 Q Okay. Let's talk about the left arm. Again, 22 that's vague. Can you tell me exactly what part of your 23 left arm hurts? 24 A My whole arm. 25 Q Entire left arm.</p>
<p style="text-align: right;">51</p> <p>1 anywhere else with that license? 2 A My Life Foundation. 3 Q Perfect. 4 Can you tell me all your current complaints? We 5 can go one by one. Don't overwhelm yourself. I know you 6 have a few. 7 A Yeah. 8 Q Let's start with orthopedic pain. 9 I know you said you were taking Tylenol for your 10 low back. 11 How about I do that? I'll read back to you the 12 parts that you said just to confirm if those are your 13 current complaints or if you have more. 14 A Okay. 15 Q So you said low back? 16 A Yes. 17 Q You said pain in your left arm? 18 A Yes. 19 Q Headaches? 20 A Yes. 21 Q Both knees, ankles, and feet but more on your 22 left side? 23 A Yes. 24 Q And then as well as your left hip? 25 A Yes.</p>	<p style="text-align: right;">53</p> <p>1 What do you feel? Sharp pain? Numbness? 2 Tingling? What is it? 3 A I feel numbness. Sometimes I drop things. 4 Tingling in my fingers. I feel aching. Especially when 5 I'm sleeping and I'm trying to move, I'm kind of stuck. 6 My arm is like numb. It feels heavy. 7 Q You said especially when you're sleeping. 8 A Yeah. 9 I'm sorry. You're breaking up. 10 Q Can you guys hear me? 11 A I don't hear you very well. You're breaking up. 12 Q Let me try again. Do you hear me now? 13 A Okay. 14 Q When you said you especially feel it when you're 15 sleeping, I want to clarify that. Do you feel numb when 16 you're sleeping like on it and it gets really heavy? Is 17 that what you mean? 18 A No, I don't have to be sleeping on it. It's just 19 -- it just -- when I wake up, when it just wakes me up, 20 yeah, and it's hurting. 21 Q So currently what would you rate, 1 out of 10, 22 your left arm pain? 23 A Right this moment? Just about a 3 or a 4 right 24 this moment. I mean, I feel discomfort. 25 Q Now, going to your headaches, are you currently</p>

<p style="text-align: right;">54</p> <p>1 feeling headaches? 2 A Not this very moment. Let me talk to you in a 3 minute. But, yeah, no. 4 Q Okay. So how often would you say you get these 5 headaches? 6 A Probably about a couple times a week. 7 Q Can you explain to me what that feels like? Is 8 it throbbing? Is it a migraine feeling? 9 A Yeah, tension. 10 MS. KHANYAN: Let the record reflect the applicant is 11 pointing between her eyebrows and at the front of her 12 head. 13 Q Is that where you get your headaches? 14 A Yes. 15 Q Tension headache. 16 Now, you said your left -- you said both your 17 knees hurt, but it's more so your left. So let's start 18 with your left knee. 19 A Mm-hmm. 20 Q What do you feel with your left knee? 21 A I'm a nurse. You said what do I feel? Pain. 22 Q Pain? 23 A Yeah. 24 Q Are you still feeling pain in your left knee? 25 A As I sit here, I don't. But once -- if I walk a</p>	<p style="text-align: right;">56</p> <p>1 Q BY MS. KHANYAN: You said your left hip; right? 2 A Yes. 3 Q When you feel pain in your left hip, what would 4 you rate that at? 5 A When it's -- right now it's maybe -- right now I 6 don't feel my hip. But when it hurts, it can be about a 7 7. 8 Q How often does your hip hurt? 9 A Anytime I'm walking too much. That can happen 10 daily or in my sleep, like I said, my positioning or 11 something is going on. 12 Q Then what about your foot? You said your left 13 foot hurt; right? 14 A Yes. My foot, yes. Left foot. 15 Q Do you feel pain or numbness? 16 A I want to say I feel pain. 17 Q How would you rate that, 1 to 10? 18 A About a 7 when it's hurting. 19 Q How often does your left foot hurt? 20 A Anytime I'm walking excessively. 21 Q When you say walking excessively for each one, 22 how much would you say? How long can you walk before you 23 start feeling these pains? 24 A Maybe about -- 25 Q Approximately. It doesn't have to be exact.</p>
<p style="text-align: right;">55</p> <p>1 little bit or I bend, yeah. I can get kind of stuck down 2 there rising. When I'm trying to get up, pressure on me. 3 Q Does it get locked up? Is that what you're 4 trying to say? 5 A It has. 6 Q When it does hurt, what would you rate it, 1 to 7 10? 8 A My knee, when it hurts, well, maybe about a 6 or 9 a 7 in that moment. 10 Q Does it last long, or do you kind of like shake 11 it off? 12 A Initially, I can shake it off. But as far as 13 continuing to walk or stand for a long period of time, 14 then yeah. Extended time, I'll have to sit down. 15 Q Got it. 16 Then what about your right knee? Does it not 17 hurt, or is it just your left knee? 18 A I get pain in my right knee with bending, when 19 I'm bending, or excessive walking. When I'm driving, my 20 right knee -- yes, my right knee will hurt. Yes, I feel 21 something. I feel pain different, discomfort. 22 Q What would you rate that at? 23 A Maybe about a 3 or a 4. 24 MR. GARCIA: Have you had any MRIs of your knee? 25 THE WITNESS: No.</p>	<p style="text-align: right;">57</p> <p>1 A Yeah, I'm trying to figure it. Like if I say 2 very -- yeah, I try to judge it. Maybe if I'm walking 3 maybe about more than 15 minutes. 4 Q Before I go back into when these pains started, 5 so aside from left side of neck, left arm, left knee, left 6 hip, left foot, and a little bit of your right knee, is 7 there any other body part that's hurting? What are your 8 complaints? 9 A My back. My bottom back. 10 Q I forgot that one. 11 MR. GARCIA: Ileen, you're talking orthopedically? 12 MS. KHANYAN: Yeah. 13 MS. FOLEY: I want to clarify what is "arm" for my 14 client because there are fingers, wrist. For us, it might 15 be different body parts, but I want to know how she 16 understands the term "arm." 17 MS. KHANYAN: I already asked her. She said it was 18 her entire arm and then she feels it in her fingers 19 sometimes. 20 MS. FOLEY: So fingers and wrists are there. Is that 21 correct, Anisa? 22 THE WITNESS: Yes. 23 MR. GARCIA: Just really quickly before we continue 24 on, at My Life Foundation, I know you're a consultant and 25 you said that job wasn't very physical or physical at all,</p>

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<p style="text-align: right;">58</p> <p>1 but that job at My Life Foundation, did you have to sit 2 and stand? 3 THE WITNESS: Yes. Yeah, I would sit down. Yes. 4 Yes. 5 MR. GARCIA: Did you ever have to bend or stoop? 6 THE WITNESS: No, not necessarily. 7 MR. GARCIA: When you would assess the patient, were 8 they sitting in a chair? Were they in bed? Where were 9 they versus where you were at? 10 THE WITNESS: They would be in a chair. 11 MR. GARCIA: Then you would sit across from them or 12 next to them and -- 13 THE WITNESS: Yes, I would sit next to them. 14 MR. GARCIA: Did you ever do any kind of physical 15 examinations of them? 16 THE WITNESS: I have, yes, looked them over. Yes. 17 Visually, yes. 18 MR. GARCIA: Does that require you to bend or stoop at 19 any point or bend? 20 THE WITNESS: Yes. Maybe a little bit. Sure. 21 MR. GARCIA: And that would require you to sit or 22 stand at various times? 23 THE WITNESS: Yeah, a couple of times. Maybe. Yes. 24 MR. GARCIA: So any other physical activity did that 25 job involve? I understand it was less physical than Playa</p>	<p style="text-align: right;">60</p> <p>1 Q Is it hurting right now? 2 A No. It's just stiff. Maybe a little annoying, 3 like about 3. You know, it's there. 4 Q How often do you feel the shoulder pain? 5 A All the time. 6 Q Do you feel it every time separate from the neck, 7 or you said, when it starts from the neck, it goes into 8 the shoulder? 9 Let me rephrase it. That was a horrible 10 question. 11 When you -- you said you feel your shoulder pain 12 all the time. Does that mean you feel your neck pain all 13 the time too? 14 A Yes. I do feel it all the time. I do feel it 15 all the time but not at a 7 all the time. 16 Does that make sense? 17 Q Yes, it does. Like, at the moment, you just feel 18 stiffness. So you rated it at a 3. 19 A Okay. 20 Q When it starts hurting, you said it goes up to a 21 7 or 8. 22 A Yes. 23 Q What do you feel that aggravates that pain when 24 it goes up from 3 to 7? What are you doing when it starts 25 hurting?</p>
<p style="text-align: right;">59</p> <p>1 del Rey, but obviously you did some physical activity at 2 that job. Is there anything else that you did besides 3 what I just mentioned with My Life? 4 THE WITNESS: Driving. Riding. Nothing more -- not 5 much more physical. 6 Q BY MS. KHANYAN: You said your low back. What 7 would you rate your low back at? 8 A Right now maybe just about, you know, 3 or 4. 9 But when it escalates, maybe about an 8, to where I almost 10 want to cry. 11 Q Any other orthopedic pain? 12 A My neck. My shoulders. My arm. My side. I 13 think that's it, ma'am. 14 Q So you just mentioned shoulders, and we didn't 15 talk about shoulders. We talked about your entire left 16 arm, which included your fingers. Now you mentioned 17 shoulders, which is plural. So both your shoulders hurt? 18 A They both hurt, but more of my left shoulder was 19 agonizing. 20 Q Earlier you said how you feel like it starts from 21 your neck and goes down to your shoulder; correct? 22 A Yes. 23 Q Then what would you rate the shoulder? Let's 24 start with left, left shoulder, 1 out of 10? 25 A When it's hurting, about a 7 or an 8.</p>	<p style="text-align: right;">61</p> <p>1 A It seems that it happens when I'm -- when I'm 2 sleeping. Yeah, it wakes me up out of my sleep. If I'm 3 trying to lift something or reaching, you know, it will 4 stop me. 5 Q Let's break that apart. 6 So when you're sleeping, do you think it's 7 because you're sleeping in a bad position? Have you tried 8 changing your sleeping position? 9 A Absolutely. 10 Q And it doesn't help? 11 A No. 12 Q Now, you said it wakes you up. Does it wake you 13 up, or are you having difficulty falling asleep because of 14 the pain? 15 A I think I fall asleep because I'm tired. But, 16 yeah, my sleep is broken because I'm waking up to 17 discomfort. 18 Q When you said lifting, it hurts when you lift, 19 does it hurt when you lift anything? Can you give me an 20 estimate of what you're lifting that causes that pain? 21 A Well, I've been -- I think I'm pretty strong. 22 I've been able to lift heavy things. Yeah, even people. 23 And now I can barely lift a 10-pound bag of potatoes. 24 Q When did you first start feeling your neck pain? 25 A When did I first start feeling it? It's kind of</p>

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1 hard to say when I first -- it's been a long time. Like,
 2 at least a year I felt pain, yes. And it has gotten --
 3 escalated, got more intense.
 4 Q Got it. Again, we're doing estimates.
 5 So at least a year ago is when it started, you
 6 would say?
 7 A Oh, yes. At least.
 8 Q Were you doing something specific when you first
 9 noticed it, or it just gradually happened?
 10 A I was working every day at Playa, lifting things
 11 and people. Yeah.
 12 Q Did you report it to anybody a year ago that your
 13 neck was hurting?
 14 A Absolutely.
 15 Q Who did you report it to?
 16 A My boss. The director, Mae Young.
 17 Q So approximately a year ago you told her your
 18 neck was hurting?
 19 A Yes.
 20 Q Did you ask for any medical treatment, or did she
 21 refer you to any medical treatment?
 22 A Yes, she referred me to take a Tylenol and rest.
 23 Q She just told you to take a Tylenol and rest?
 24 A Yeah. Yes.
 25 Q My question was did she refer you to see any

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1 doctor? Did you ask to see any doctor?
 2 A No. No. No.
 3 Q Did you tell her you felt like the pain was
 4 caused because of the job?
 5 A Yes.
 6 Q Did she write a report?
 7 A Not that I'm aware of.
 8 Q Did you ask her to see a doctor because of the
 9 pain that was caused by the job?
 10 A Asked her?
 11 MS. FOLEY: The question was asked and answered
 12 several times already. If you don't get the answer that
 13 you want, it doesn't mean you have to repeat it five,
 14 twenty times.
 15 MS. KHANYAN: No. I asked her --
 16 (Cross-talk.)
 17 MS. FOLEY: You asked her did she ask to send her to
 18 the doctor, and she said she complained about the pain.
 19 MS. KHANYAN: So my next question --
 20 MS. FOLEY: It's not her job to ask to be sent to the
 21 doctor.
 22 Q BY MS. KHANYAN: My question is did you ask to
 23 see a doctor? Not the employer ask you.
 24 A Did I ask --
 25 THE REPORTER: I'm sorry. Can you repeat? There was

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1 overlap.
 2 MS. FOLEY: Objection. My objection is that question
 3 was asked and answered several times. Attorney didn't get
 4 the answer she wanted, so she keeps repeating. She can do
 5 it, but I instruct my client not to answer because it was
 6 already asked.
 7 MS. KHANYAN: We can have the court reporter read back
 8 the first question about the employer offering treatment
 9 and then the second question. I think it was if you
 10 requested treatment. There's different --
 11 MS. FOLEY: I understand.
 12 MS. KHANYAN: That's a different question. Are you
 13 still instructing her not to answer?
 14 MS. FOLEY: Yeah, because it's not her duty to ask to
 15 be sent to the doctor. Her duty is to report and to
 16 complain. She did it.
 17 MS. KHANYAN: That's not my question. I'm not asking
 18 her what her duty is. My question is --
 19 MS. FOLEY: Then ask, please, the reporter to read the
 20 answer, two, three times after the question.
 21 (The record was read.)
 22 MS. KHANYAN: Got it. Compound question.
 23 MS. FOLEY: The objection is the question is compound.
 24 There are two questions together. So it's difficult for
 25 you and everyone to discern what was question.

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1 (Technical interruption.)
 2 MS. KHANYAN: I'll allow your objection. It was a
 3 compound question. I asked two questions at once. So the
 4 answer doesn't reflect which one it is. So I have my
 5 right to ask the second question. So I apologize for
 6 making it compound.
 7 MS. FOLEY: You have a right to ask whatever you want
 8 to ask her. That's clear. But when you keep asking the
 9 same question and you're not getting the answer you're
 10 wanting, it doesn't mean that you can keep asking the
 11 question until tomorrow morning.
 12 MS. KHANYAN: Okay. Here's what I'm going to tell
 13 you. If you're going to instruct her not to answer a
 14 question that I ask compound and you're not going to allow
 15 me to ask her a question, then I'm going to take this
 16 before a judge.
 17 It's a simple question. I asked her two
 18 questions at once, and she answered "no" to both of them
 19 combined. So you objected to it being compound. I
 20 concede that it was a compound question. But I only got
 21 an answer, and we can't refer to which one it was to.
 22 So now I'm going to instruct her to answer. If
 23 you're still going to object to it, then we'll take it --
 24 MS. FOLEY: You won't instruct my client. I instruct
 25 my client to answer to the extent she understands your

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1 question.

2 MS. KHANYAN: So I'll rephrase the question.

3 Q So the question is did you ask to see a doctor

4 because of the neck pain that you said was caused by the

5 employment?

6 If you don't understand the question, please tell

7 me, and I can repeat it or rephrase it.

8 A Can I ask you a question? Are you asking me did

9 I ask her to send me to the doctor?

10 Q I'll rephrase it so you understand the question.

11 Did you ask Mae to see a doctor because of the

12 neck pain that you said was caused by work? It's a "yes"

13 or "no."

14 THE REPORTER: What's the answer?

15 THE WITNESS: No.

16 Q BY MS. KHANYAN: Is there any reason why you did

17 not request treatment?

18 A I sorted it out on my own.

19 Q Who did you see? When you say you sought

20 treatment on your own, what doctor did you see for the

21 neck pain?

22 A Dr. Hernandez.

23 Q And that was approximately a year ago, you said;

24 right?

25 A Approximately a year ago. I'm not sure exactly.

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1 I'm not sure which doctor. It could have been at Kaiser.

2 Sorry. I think it could have been Kaiser at that time.

3 Q That's fine.

4 So you either saw Dr. Hernandez or Kaiser

5 approximately a year ago for the neck pain? Am I getting

6 that right?

7 A Yes. Yes.

8 Q Were you placed on any restrictions or missed any

9 date -- compound. Sorry.

10 Were you placed on any restriction because of the

11 neck pain approximately a year ago?

12 A No.

13 Q Did you miss any days off work because of the

14 neck pain?

15 A Yes.

16 Q How many days would you say you missed?

17 A Maybe a few. I'm not sure. But, yeah, I'm sure

18 I called off a few times.

19 Q Again, that was approximately a year ago?

20 A Yes.

21 Q Did you report to the employer that you were

22 calling out sick because of the neck?

23 A I'm not sure specifically what I indicated.

24 MS. FOLEY: Anisa, if you don't remember, it's easier

25 to tell us. It's okay. Nobody has a perfect memory.

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1 So you're not sure or you don't --

2 THE WITNESS: Yeah, I don't remember.

3 Q BY MS. KHANYAN: To your left arm. We're talking

4 about your left arm. When did you first start feeling

5 pain to the left arm?

6 A Maybe back in 2019.

7 Q So, again, approximately a year ago?

8 A Yes.

9 Q Did you tell anybody at the employer that you

10 were feeling pain to the left arm?

11 A Yes.

12 Q Who did you tell?

13 A I told Mae. Mae Young and -- yeah.

14 Q Mae Young and?

15 A I believe it was just she. Maybe someone who was

16 filling in for her.

17 MR. GARCIA: As far as you know, Mae Young is still

18 working there?

19 THE WITNESS: I assume so. She's like the -- yes, I

20 assume so. I believe she's the owner of the company.

21 Q BY MS. KHANYAN: When you told Mae that you were

22 feeling pain to the left shoulder, did she send you to a

23 doctor or a clinic?

24 A No.

25 Q Did she write a report?

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1 A I don't know.

2 Q Did you tell Mae that this left arm pain was

3 because of the job?

4 A Yes.

5 Q Did you ask her to see a doctor?

6 A I don't know that I did.

7 Q Sorry. You cut off.

8 "I don't know that I didn't"?

9 A I don't know that I asked -- asked her.

10 Q So you don't remember?

11 A I don't remember.

12 Q Did you seek treatment privately on your own?

13 A Is that for my arm? What are you talking about?

14 Q Yes.

15 A Yes. Yes.

16 Q Where did you seek treatment for the left arm?

17 A With my doctor.

18 Q Dr. Hernandez?

19 A I believe so.

20 Q Do you recall if you told the doctor that the

21 left arm was because of the job at Playa?

22 A Yes.

23 Q And he continued to treat you for the left arm

24 because of the job?

25 A I don't -- ask me that question again. You said

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<p style="text-align: right;">70</p> <p>1 did he continue? 2 Q I'll repeat it, or I'll rephrase it. 3 Did Dr. Hernandez continue to treat you for the 4 left arm that was caused because of the job? 5 A No. 6 Q So you only saw him one time for the left arm? 7 A No. 8 Q So he did continue to treat your left arm? 9 A I complained of pain and discomfort. No specific 10 treatment. Well, I want to think I was maybe prescribed 11 some pain medication or something. I don't recall. 12 Q That's fine. We'll get the records from him 13 later. 14 A Sure. 15 Q Is there any -- 16 A I don't hear you. 17 Q Is there any reason why you did not ask for 18 medical treatment at the workplace? 19 A Well, I didn't know it was going to continue to 20 be a problem. 21 Q But it did continue to be a problem; right? 22 A Yes. 23 Q Why did you not ask for treatment since the 24 problem continued? 25 A I asked them to adjust my work assignment, my</p>	<p style="text-align: right;">72</p> <p>1 this pain; right? 2 A Well, I said I complained to my doctor about the 3 pain. 4 Q So you did feel the need to complain about it; 5 right? 6 A Yes. 7 Q Because you were in pain, I assume; right? 8 A Right. 9 MR. GARCIA: Back up. Did you say you didn't know you 10 needed to see a doctor? 11 THE WITNESS: No, I didn't. 12 MR. GARCIA: Is that what you just said, "I didn't 13 know I needed to see a doctor"? 14 THE WITNESS: I didn't know it was going to be a 15 continual issue or problem. 16 MR. GARCIA: Okay. 17 THE WITNESS: Yeah, I guess -- no, I didn't. At that 18 time, I did not know that I needed to seek treatment for 19 my pain. 20 Q BY MS. KHANYAN: Got it. 21 But you did seek treatment with Dr. Hernandez; 22 right? 23 A I did complain about the pain, yes, to my doctor. 24 Q And you said he may have prescribed you pain 25 medicine; right?</p>
<p style="text-align: right;">71</p> <p>1 workload so that I wouldn't have to endure that part. 2 Q Sorry. I want to clarify. 3 You asked them to adjust your work assignment so 4 you wouldn't have to what? 5 A To lift and pull and feel my pain, yeah. 6 Q Got it. 7 And when you asked them to adjust your work 8 assignment, was that still in 2019? 9 A Oh, yes. All the way. I've been asking for a 10 long time. 11 Q Did you tell them you were asking for an 12 adjustment because of the left arm pain? 13 A I told them because I was in pain, yes. 14 Q Specifically to the left arm? 15 A Well, it was more -- yes, it was not just the 16 left arm. It was because of my overall pain. 17 Q At that point when you asked for them to change 18 it, did they ask you to see a work comp doctor? 19 A No. 20 Q Did they write a report at that point? 21 A I don't know. 22 Q Why didn't you ask them for a -- to see a doctor 23 at that point? 24 A I didn't know that I needed to see a doctor. 25 Q But you said you were seeing Dr. Hernandez for</p>	<p style="text-align: right;">73</p> <p>1 A Yes. I believe he may have offered for me pain 2 medicine, but I don't prefer to take pain medicine. 3 Q Got it. 4 Did you know that you had a right to report 5 workers' compensation injuries? 6 A That I had a right? 7 Q Should I rephrase it? Did you not hear me? 8 A I just want to make sure I understand what you 9 said. Say it again, please. 10 Q While working for Playa, did you know that you 11 had the right to report any work-related injuries? 12 A Well, I did report it. 13 Q It's a yes-or-no question. Yes, you knew you had 14 the right? 15 A The right? No, I don't know when you say 16 "right." I don't know. No. No. 17 Q When you were at Playa, when you got the job, did 18 anybody tell you at orientation, for example, that when 19 you get injured on the job, that you should report it? 20 A I don't remember. 21 Q Do you guys have a lunchroom, a cafeteria, or 22 where nurses have lunch? 23 A There was a place. No. Yes. That's -- I don't 24 know how -- no, there was not a specific place that was -- 25 well, we had a makeshift place for us to have lunch.</p>

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<p style="text-align: right;">74</p> <p>1 Q On the walls that this makeshift little -- was it 2 an office, or what was it? A cafeteria? 3 A The dining room. 4 Q Let's call it "the dining room." 5 In the dining room, was there any notification on 6 the walls about work-related injuries? 7 A No. 8 Q But did you have knowledge that, when people get 9 injured on the job, that they can report it? 10 A That they can report it? Yes. 11 Q When did you start feeling headaches? You said 12 tension headaches in the front. 13 A Probably like about a year or so ago, yeah. Back 14 in 2019. 15 Q How about month? Approximate month in 2019? 16 A Maybe -- maybe about January 2019. 17 MS. KHANYAN: Sorry. Off the record. 18 (Off record from 4:10 p.m. to 4:12 p.m.) 19 Q BY MS. KHANYAN: So around January 2019, did you 20 tell anybody at the employment that you were having 21 headaches? 22 A I said -- headaches, maybe initially -- I don't 23 recall. No, I don't recall. I'm thinking January. Maybe 24 a little -- January. 25 Q It's okay if you don't recall the dates.</p>	<p style="text-align: right;">76</p> <p>1 A I don't remember. 2 Q Do you remember ever at any point asking for 3 medical treatment for a headache? 4 A I've asked for medication at work, if that's what 5 you mean. 6 Q I mean, that's an answer. If you didn't ask for 7 treatment and you asked for medication, that's your 8 answer. 9 Did you just ask for medication? Is that what 10 you mean? 11 A Well, when you say -- yeah, I maybe have asked to 12 have some Tylenol at work because I'm having a headache 13 maybe on a few occasions. Yes. 14 Q And would that be asking Mae again? 15 I think you froze. 16 A I wouldn't ask her specifically. I reported to 17 her that I wasn't feeling well, but I would ask the nurses 18 for medication. 19 Q Did you ask anybody for medical treatment at any 20 point for the headache? Not medicine. Treatment. 21 A Treatment? 22 Q Like to go see a doctor? 23 A No, I don't remember if I asked. 24 Q At any point? 25 A At any point?</p>
<p style="text-align: right;">75</p> <p>1 MS. FOLEY: Anisa, we don't want -- 2 THE WITNESS: Yeah, I don't recall that. 3 MS. FOLEY: We want your best estimate. So if you 4 remember, tell us. If you don't, tell us that you don't. 5 THE WITNESS: Yeah, I don't remember. 6 Q BY MS. KHANYAN: Remember, you don't have to 7 recall exact dates. I'm just saying did you report it or 8 not? 9 A I reported that I was having headaches, yes. 10 Q Okay. Who did you report it to? 11 A To the director. To Mae. To Mae or whoever was 12 standing in for her or both. 13 Q What did Mae or whoever was covering for her tell 14 you in response to that? 15 A "Take a break. Relax." "Oh, you'll be okay." 16 Q Did you tell them that you felt the headaches was 17 caused by the work there? 18 A Yes. 19 Q Can you tell me what exactly you told them? 20 A The work is overwhelming. It is causing me 21 physical distress. I'm in pain, and I'm having physical 22 symptoms, yes. I'm overwhelmed, overworked. I'm in pain, 23 in distress. 24 Q Did you request to get medical treatment at that 25 point for the headache?</p>	<p style="text-align: right;">77</p> <p>1 MS. FOLEY: Can you please lay a foundation for your 2 question, Counsel? 3 MS. KHANYAN: Yes. She says she doesn't remember if 4 she asked -- 5 MS. FOLEY: No. The foundation is you explain the 6 relevance. I want to know what is the relevance of the 7 question if she requested the treatment. 8 MS. KHANYAN: Reporting your work-related injuries is 9 the most relevant -- 10 MS. FOLEY: Okay, I agree. But reporting -- I don't 11 know any law in the Labor Code, a specific section that is 12 saying applicant is supposed to request a medical 13 treatment, beg for it, shake the supervisor, screaming 14 "Give me the treatment." I don't know a section of the 15 law that requires that. So if you know, please enlighten 16 me, and that would be the foundation for your question. 17 Otherwise, I don't understand why you're insisting on this 18 question. 19 Requesting, I agree. But reporting and 20 requesting medical treatment is two different things. 21 MS. KHANYAN: Yes, it is two different things. And I 22 don't have to cite the law -- 23 MS. FOLEY: I'm just asking you to lay a foundation. 24 You don't need to cite a law. 25 MS. KHANYAN: We're going to talk at once because the</p>

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<p style="text-align: right;">78</p> <p>1 court reporter --</p> <p>2 MS. FOLEY: Go ahead.</p> <p>3 MS. KHANYAN: When you ask me to lay a foundation, it</p> <p>4 doesn't mean I have to cite to the law. The foundation of</p> <p>5 my question is the relevance of this question. The</p> <p>6 relevance of whether she asked for treatment is whether,</p> <p>7 if she was in agonizing pain, you would ask your employer,</p> <p>8 "Hey, I'm in so much pain. This is caused by the work,</p> <p>9 and I want to see a doctor."</p> <p>10 So I'm asking her if she had tension headaches.</p> <p>11 Yes. Did you report to the employer? Yes. Okay. Did</p> <p>12 you ask to see a doctor at any point? And that's what I'm</p> <p>13 waiting for.</p> <p>14 MS. FOLEY: That's why you said "agonizing pain." But</p> <p>15 this is your assumption. I didn't hear my client saying</p> <p>16 even once that she was in agonizing pain. So you're</p> <p>17 asking on your own assumptions.</p> <p>18 I'm just giving you that idea why I object, but</p> <p>19 you can continue.</p> <p>20 MS. KHANYAN: I'm not putting words in her mouth to</p> <p>21 say she had agonizing --</p> <p>22 MS. FOLEY: Absolutely, you do.</p> <p>23 (Cross-talk.)</p> <p>24 THE REPORTER: We got to go one at a time. We got to</p> <p>25 go one at a time. Please.</p>	<p style="text-align: right;">80</p> <p>1 Okay? I'm just saying I object. We've noted that. You</p> <p>2 can continue.</p> <p>3 MS. KHANYAN: My only question is what grounds do you</p> <p>4 object on? What is the objection? On relevance?</p> <p>5 Objection on --</p> <p>6 MS. FOLEY: On relevance. Absolutely.</p> <p>7 MS. KHANYAN: Now, relevance -- now, in response to</p> <p>8 your relevance, it is relevant if she reported her injury</p> <p>9 or not, yes. And it's relevant if she asked for</p> <p>10 treatment. I didn't say she's required --</p> <p>11 (Cross-talk.)</p> <p>12 THE REPORTER: Wait, wait, wait. We have to go one at</p> <p>13 a time because I'm losing the words because I can't hear,</p> <p>14 I can't make out the words when you're talking on top of</p> <p>15 each other.</p> <p>16 MS. KHANYAN: So she asked to mark her objection.</p> <p>17 Then I said, "On what grounds?"</p> <p>18 MS. FOLEY: On relevance.</p> <p>19 MS. KHANYAN: Then she said "relevance." Now I'm</p> <p>20 responding to her why asking her if she requested</p> <p>21 treatment is relevant.</p> <p>22 MS. FOLEY: It is relevant. I don't object to that.</p> <p>23 I object to the specific question of why she didn't</p> <p>24 request the treatment.</p> <p>25 MS. KHANYAN: So let's move on.</p>
<p style="text-align: right;">79</p> <p>1 MS. FOLEY: I would recommend you to refrain that</p> <p>2 question about requesting medical treatment, but you can</p> <p>3 disregard. Please note my objection.</p> <p>4 MS. KHANYAN: So your objection is that I shouldn't</p> <p>5 ask the client whether your client -- whether or not she</p> <p>6 asked for treatment? Is that your objection?</p> <p>7 MS. FOLEY: Yeah. Because you're assuming that she</p> <p>8 was in agonizing pain and then a person in agonizing pain</p> <p>9 will ask her that.</p> <p>10 (Cross-talk.)</p> <p>11 MR. GARCIA: She's just asking the question, Did you</p> <p>12 request treatment? It's just "yes" or "no."</p> <p>13 MS. FOLEY: And the relevance of that would be</p> <p>14 compliance with the law --</p> <p>15 MR. GARCIA: Well, no --</p> <p>16 MS. FOLEY: -- for the treatment --</p> <p>17 (Cross-talk.)</p> <p>18 MR. GARCIA: The question is, hey, did you report it?</p> <p>19 Yes or no? Did you ask for treatment? Yes or no? That's</p> <p>20 it.</p> <p>21 And depending on her answer, we go from there.</p> <p>22 The reality is she's an RN. She should know, Do</p> <p>23 I need treatment? Should I ask for treatment? Should I</p> <p>24 ask to go see a doctor.</p> <p>25 MS. FOLEY: We can keep that discussion later on.</p>	<p style="text-align: right;">81</p> <p>1 MS. FOLEY: Okay.</p> <p>2 Q BY MS. KHANYAN: The left knee pain. When did</p> <p>3 you start feeling pain to your left knee?</p> <p>4 A 2019.</p> <p>5 Q It was, again, around January, the same time as</p> <p>6 the headaches? Or when was it?</p> <p>7 A You're saying January. Maybe about -- this could</p> <p>8 have been around June or July, maybe.</p> <p>9 Q Again, approximate is fine. You don't have to</p> <p>10 give me exact dates.</p> <p>11 Did you report to your supervisor that your left</p> <p>12 knee was hurting?</p> <p>13 A Yes.</p> <p>14 Q Was it to Mae Young?</p> <p>15 A Yes.</p> <p>16 MS. KHANYAN: I'm sorry. My computer is freezing.</p> <p>17 Let's go off the record for a second.</p> <p>18 (Off record from 4:21 p.m. to 4:22 p.m.)</p> <p>19 Q BY MS. KHANYAN: Was it approximately June or</p> <p>20 July that you reported it to Mae?</p> <p>21 A Yes.</p> <p>22 Q What did you tell her?</p> <p>23 Remember, you don't have to --</p> <p>24 A I explained -- I told her that I was having</p> <p>25 physical pain because of the work that I was having to do.</p>

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1 Yeah, that I was hurting.
2 Q What did she tell you in response to that?
3 A She would tell me to relax, relax a little.
4 They're working on getting me some help. Yeah, that's it.
5 I'm young. I'm okay. "You'll be okay."
6 Q And you did say that you felt the left knee pain
7 was caused by the work?
8 A Yes.
9 Q When you said she said, "We're working on getting
10 you some help," do you know if it was medical help or did
11 she mean additional helpers?
12 A Additional staff to assist to do the work that I
13 was having to do, yeah, to lighten the load.
14 Q Did you request medical treatment for the left
15 knee?
16 A I don't recall.
17 Q At any point?
18 A I did. I did tell her I needed to see a doctor
19 at some point, that I needed -- yeah, that I was going to
20 have to see a doctor till eventually I went on my own.
21 Q Did you end up getting treatment on your own for
22 the left knee?
23 A I haven't gotten treatment. No, I didn't get
24 treatment. I recently started getting treatment but not
25 when I first reported it. I self -- I used knee braces,

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1 Tylenol, topical gels, whatever I could put on it.
2 Q How bad was the pain in July or June of 2019?
3 What would you rate it?
4 A It was intense. Maybe it was -- are we speaking
5 about my knee?
6 Q Yes.
7 A Yes, my knee. I can't recall exactly when.
8 Q But you said it was intense; correct?
9 A Yeah. It began to progress the more I had to
10 walk and stand, yes.
11 Q And when you felt like it was getting worse, did
12 you end up asking for treatment?
13 A I reported it and complained about it.
14 Q So you reported about the left knee more than
15 once?
16 A I complained about pain several, several times.
17 Q Right now I'm talking only about the knee.
18 A I don't recall exactly.
19 Q You just only recall that one time?
20 A I recall complaining several times.
21 Q About the left knee?
22 A Specifically the knee? I'm not sure specifically
23 to say the knee. I complained about my overall pain
24 constantly.
25 Q But you didn't seek treatment? You just put

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1 ointments and Tylenol; is that correct?
2 A I reported my discomfort to my doctor. I refused
3 pain medication. So I used over-the-counter medication
4 and topical, yes, ointments, braces, and I went to work,
5 yes.
6 Q But you reported it to your personal doctor. Is
7 that Hernandez?
8 A My confusion there is because I had Kaiser for a
9 short time. So I'm not sure exactly the doctor who I
10 specifically reported it to. That's my confusion there.
11 Q That's totally fine. We're going to --
12 A One of the doctors I complained, yes.
13 Q Did you tell the doctor that you felt like the
14 left knee was because of work?
15 A Yeah, I told him my overall body pain. Yes.
16 Q That wasn't my question. My question was did you
17 tell them it was because of work?
18 A Yes, I told my pain was because of work. Yes.
19 Q Got it.
20 When is the last time you treated for the left
21 knee? I know you said the first time was recently, which
22 means 2020; right?
23 A Yes.
24 Q But you also said you may have treated for it in
25 Kaiser or with Hernandez, but the first time was before

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1 2020; right?
2 A I said I complained of it, not treated, because I
3 didn't get treatment for it other than my own personal
4 treatment that I gave myself.
5 Q Got it.
6 So let's talk about complaining and not the
7 treatment. You complained to either Hernandez or a doctor
8 at Kaiser about the left knee; right?
9 A Yes. Yes, I complained to the doctor about my
10 knee. My knee -- I'm not sure. I don't know about my
11 knee for Dr. Hernandez or Kaiser. I'm not sure about
12 that.
13 Q Earlier you said you did complain. Now you're
14 saying you're not sure.
15 A Well, you're being specific. But I complained to
16 the doctor about my overall pain. So yeah. I don't know
17 about the specifics, who and what I told. No, I don't
18 know.
19 Q That's fine. You don't have to remember exactly
20 which doctors it was, either Kaiser doctors or if it was
21 Hernandez. But you said you may have complained about the
22 knee; right?
23 My question is did the doctor provide any
24 treatment for the knee?
25 A No.

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1 Q Got it. So you only complained.
2 When you said you started treating for the left
3 knee in 2020, who was that with?
4 A Dr. Gofnung.
5 Q Do you recall when your left hip started hurting?
6 A When it started?
7 Q Yeah. Approximately. Just like we've been
8 doing with the other body parts.
9 A Yeah. But, you know, the time frame is kind
10 of -- yeah. My hip maybe -- maybe about sometime in 2019.
11 This is a whole year. 2019, yes.
12 Q Do you recall ever telling anybody at the
13 employment that your left hip was hurting?
14 A Yes.
15 Q Again, would that be Mae?
16 A Yes. The only person, yeah.
17 Q What did you tell Mae about your left hip?
18 A I told her that I was hurting and that I wasn't
19 able to continue to do my duties due to my pain, yes.
20 Q When you told her you weren't able to continue
21 your duties because of the pain in your left hip, what did
22 she tell you?
23 A She's going to get some help. She's going to get
24 me some help. To do the best I can. Take some medicine.
25 I'm strong. Yes.

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1 Q She never offered you medical treatment?
2 A No. She offered me some Tylenol.
3 Q Did you tell her the left hip was also because of
4 work there?
5 A Yes.
6 Q Did you seek medical treatment for the left hip
7 back then in 2019?
8 A Can I say something?
9 I'm not sure that I specified the hip. I might
10 have told her my back, my back. I might not have realized
11 that it was my hip so much.
12 Q Got it.
13 So you may have told Mae it was your back, not
14 your hip?
15 A Yeah, I might have referred to my pain as my back
16 and my legs are hurting. Maybe not specifically say hip.
17 Q Got it.
18 So would that both be legs and hip -- sorry, legs
19 and low back was around 2019, though; right?
20 A Yes.
21 Q And that's when you told her you're not able to
22 continue your duties; right?
23 A Yes.
24 Q And she did not offer medical treatment, but she
25 offered you Tylenol; right?

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1 A You stopped.
2 Q Sorry.
3 I said she did not offer you medical treatment,
4 but she offered you Tylenol; right?
5 A Yes. Yes. Passively. Like, "Take some
6 Tylenol," yes.
7 Q Did you seek -- did you request medical
8 treatment?
9 A I don't remember exactly how -- yeah, what my
10 statement was. If I requested, I don't know.
11 Q Again, you don't have to remember specifics of
12 your statement, but do you recall ever asking for medical
13 treatment for your back or your legs in 2019?
14 A Are you saying I asked her for medical treatment?
15 Q Yes. Did you ever ask her or anybody at Playa
16 del Rey that you want to be sent for treatment?
17 A No, I don't recall asking anyone.
18 Q Is there any reason why you didn't ask for it?
19 A I really thought the discomfort and the pain
20 would pass.
21 Q But you felt like you couldn't continue your
22 duties. So did you seek treatment for it outside of like
23 the employer, like personal treatment?
24 A I took -- I self-medicated and continued to go to
25 work.

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1 Q Was the self-medication helping? Did the pain go
2 away?
3 A It would help me get through my shifts. But, you
4 know, yes, it would help me get through my shift. But,
5 no, it didn't go away completely. It would come back. As
6 I continued to work, I would feel tired and in pain and
7 sleep in pain. Yeah.
8 Q Got it.
9 Did you complain about this to your private
10 doctor at that point?
11 A About the pain?
12 Q Yes, to the back and legs.
13 A I complained to -- yes, I complained to the
14 doctor that I was having pain.
15 Q Do you remember if that one was Hernandez or
16 anybody at Kaiser?
17 A I believe the pain complaint -- are we talking
18 about during 2020 because that's --
19 Q No, no, no. I'm talking about 2019. You told
20 Mae that you were unable to continue your duties, and she
21 offered you Tylenol.
22 So I was hoping to get a time line so you don't
23 get confused.
24 So she didn't offer you treatment, but she
25 offered you Tylenol. And then you said you don't remember

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1 asking any of them for medical treatment back then in
2 2019.
3 So my next question, which is where we're at now,
4 is did you complain of your low back and leg to your
5 personal doctor in 2019?
6 A I've complained of pain, yes. Of being in
7 discomfort to my doctor, yes.
8 Q And what did the doctor prescribe or treat you
9 with?
10 A No treatment.
11 Q What did the doctor tell you?
12 Did we lose you?
13 A I'm still here. I want to think.
14 I almost think that was Kaiser. I believe they
15 told me that I needed to make more appointments because I
16 had too many things going on.
17 Q They told you to make more appointments because
18 there was too many things going on?
19 A Yeah.
20 And I didn't return back to Kaiser. That's when
21 I ended up back at Aetna. I was having a problem with my
22 insurance, actually. Yeah. So it's kind of confusing for
23 me. I'm sure that was in 2019.
24 So my Kaiser visit was not -- I wasn't getting
25 the service that I expected from there. So I wasn't

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1 encouraged to pursue any treatment. I just went along. I
2 just beared it. I just tolerated it until I couldn't and
3 waited for work to try to help me out in the situation so
4 that I wouldn't have to, you know, have to do the physical
5 work. And I'm thinking I'm going to be okay.
6 Q So did they end up getting you additional help?
7 A No. No.
8 Q Did your pain get worse? Did it stay the same?
9 Did it get better?
10 A No. It got worse.
11 Q Did you raise concern about your pain to the
12 employer when it got worse?
13 A Yes.
14 Q Was it again to Mae the second time?
15 A A lot of times, yes.
16 Q And none of the times that you complained to Mae
17 about the work injuries did she send you for medical
18 treatment?
19 A No.
20 Q Do you know if she ever wrote a report about your
21 injury that you reported?
22 A I don't know.
23 Q Did you ever have to fill out a report about
24 these injuries that you reported?
25 A No.

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1 MR. GARCIA: Do you supervise anybody?
2 THE WITNESS: I'm sorry?
3 MR. GARCIA: Do you supervise anybody?
4 THE WITNESS: Do I?
5 MR. GARCIA: Yes. At Playa del Rey, did you ever
6 supervise anybody?
7 THE WITNESS: Yes, I was the supervisor.
8 MR. GARCIA: So when someone would report an injury to
9 you -- well, did anyone ever report an injury to you?
10 THE WITNESS: No.
11 MR. GARCIA: But if someone did, would you know what
12 to do? Hello?
13 THE WITNESS: No, not exactly.
14 I'm here. Can you hear me?
15 MR. GARCIA: Yes, yes.
16 THE WITNESS: Did I go away?
17 MR. GARCIA: We can hear you.
18 THE WITNESS: Am I still here?
19 MR. GARCIA: Yes.
20 THE WITNESS: At some point, there was a note, a
21 folder given that we were -- if there was an injury on my
22 shift, we were to fill out a form or something in the
23 paper from out of the notebook. The person -- yeah, you
24 were supposed to fill out a form and report it to the
25 director.

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1 MR. GARCIA: Right.
2 THE WITNESS: I believe so. I don't know if that had
3 to do with something else.
4 MR. GARCIA: Okay. Just so I'm clear, the people that
5 you supervised, if they reported an injury, you would have
6 this folder and that person would fill out a report of
7 some type? Is that what you're saying?
8 THE WITNESS: I want to think -- I'm not really -- I'm
9 not sure. I don't want to say -- I don't want to give the
10 wrong information. That was for if someone -- if you
11 got -- maybe. I'm not sure about that. Yeah, no, I don't
12 know.
13 MR. GARCIA: What I'm getting at is, when you reported
14 these issues to Mae Young, did you ever request or write a
15 report up yourself knowing that's what should be done?
16 THE WITNESS: I didn't know -- I don't know what
17 should have been done.
18 MR. GARCIA: Okay.
19 THE WITNESS: For my complaint, I don't know what
20 should have been done.
21 Q BY MS. KHANYAN: But do you know what should have
22 been done when somebody else complained?
23 A About their physical complaints? I don't know.
24 Q Okay. So let me ask a different -- a completely
25 different question.

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1 As a supervisor yourself, when somebody reports
2 an injury to you -- and you said that hasn't happened --
3 were you taught what to do?
4 A No.
5 Q They never trained you on what to do when
6 somebody reported an injury?
7 A No, I never had to deal with that.
8 MR. GARCIA: Okay. Never having to deal with it and
9 not knowing what to do are two different things. So I
10 understand no one reported an injury to you as a
11 supervisor. But if someone did, did you know what to do
12 next?
13 THE WITNESS: If somebody reported an injury to me?
14 MR. GARCIA: Yes, somebody you supervised.
15 THE WITNESS: I would report it to the director.
16 MR. GARCIA: Would you give that employee who reported
17 injury to you anything? A document or a report to fill
18 out?
19 THE WITNESS: No.
20 Q BY MS. KHANYAN: So the director would have to
21 deal with it?
22 A Right. That's not my place.
23 MR. GARCIA: And Mae Young is the director?
24 THE WITNESS: Yes.
25 MR. GARCIA: Go ahead, Ileen.

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1 MS. KHANYAN: I'm going to need a two-minute break,
2 guys.
3 MR. GARCIA: That's fine.
4 (Recess from 4:43 p.m. to 4:49 p.m.)
5 Q BY MS. KHANYAN: Approximately how many times
6 would you say you reported your work-related injuries to
7 Mae in the past year, let's say?
8 A Is that specific to say I'm having pain here,
9 pain there or --
10 Q When you tell her you have work-related pain,
11 regardless of body part, headache, nausea, just
12 work-related, how many times? Same question, just
13 work-related to pain.
14 A At least twice a month over the last year.
15 Q To clarify, at least twice a month over the last
16 year, you would tell her you had pain because of the work?
17 A Yes, yes.
18 THE REPORTER: Counsel, can you repeat that, please?
19 MS. KHANYAN: My question exactly was, "Approximately
20 how many times would you say you reported the work-related
21 injuries to Mae?" Then she asked me do you mean -- I
22 can't remember her exact words, but she asked if it was
23 just complaining of pain. And then I clarified
24 work-related pain, it doesn't matter to which body part,
25 "any body part as long as you said it was because of the

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1 work." And then she said at least two times a month over
2 the last year.
3 THE WITNESS: Yes.
4 Q BY MS. KHANYAN: Did you find it concerning that
5 you complained about work-related injuries two times a
6 month -- approximately two times a month over the last
7 year and you didn't seek medical treatment for it?
8 A And your question to me about it was what?
9 Repeat it.
10 Q So you complained about the injury -- the
11 work-related injuries at least two times a month over the
12 last year. Why didn't you seek medical treatment for it?
13 A I did. Why I did not?
14 Q So you did seek medical treatment for it?
15 A Well, yes, I complained to my doctors about it.
16 I was having insurance issues. I really didn't know the
17 extent of my pain. I really believed, if I didn't have to
18 continue to do that, that I would be okay. If I could
19 relax my body and give it a chance to not be -- this is
20 every day consistent that I was doing this. So I'm
21 waiting for the opportunity to come down like to let me
22 take care of myself, and I'm thinking I'll be okay.
23 Q Okay. So I'm going to break that down because
24 that was a lot.
25 So you said you did complain to your personal

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1 doctors about it.
2 A Yes.
3 Q But did they treat you for it?
4 A I didn't take any treatment for it.
5 Q They prescribed you stuff and you chose not to?
6 Is that what you mean?
7 A I didn't take a prescription for anything, no.
8 Q Did they prescribe you anything, though?
9 A For pain, no.
10 Q What about for your discomfort?
11 A I was offered pain medicine, but I declined.
12 Q Who offered you pain medicine?
13 Anisa, can you hear me?
14 A Yeah. I just want to -- Dr. Hernandez.
15 Dr. Hernandez did. Definitely earlier this year he did.
16 Q Pain medicine? Do you know for which body part?
17 A Generalized pain.
18 Q And you said "earlier this year." You mean 2020?
19 A 2020.
20 Q Like January 2020? February? Around there?
21 A Probably about May. It was April, May. May.
22 Q You said "generalized pain." Generalized pain to
23 what body part?
24 A Well, I complained that I was in pain overall. I
25 believe I indicated my left side and my back.

<p style="text-align: right;">98</p> <p>1 Q Then Hernandez prescribed you the medicine, but 2 you never took it? 3 A He offered me the medicine, and I wasn't going to 4 take any pain medicine. 5 Q But did he ever give you a prescription for it? 6 A Not for pain. He might have wrote me for 7 Celebrex, anti-inflammatory, I believe, maybe, and then 8 some depression medicine, anxiety and depression 9 medication. 10 Q Where do you pick up your prescriptions from? 11 A CVS. 12 Q Which CVS location? 13 A Hawthorne. Rosecrans and Prairie. 14 Q Rosecrans and Prairie? Did you hear me? 15 A Yes, yes. 16 I'm sorry. Can you hear me? 17 Q Yes, I can hear you. Don't worry. 18 Did he prescribe you the Celebrex, that 19 anti-inflammatory that you're referring to? 20 A This was in about April or May. I think it was 21 in May. 22 And you say "prescribed." I'm not sure. I 23 didn't have that medication. So I don't know if I didn't 24 pick it up or I just told him -- I believe he made a 25 prescription for the Celebrex. I believe it's for</p>	<p style="text-align: right;">100</p> <p>1 Q What else other than stress, anxiety, and the 2 orthopedic pain? Anything else? 3 A I had chest pain and shortness of breath. My 4 headaches, of course. I had abdominal discomfort almost 5 daily. 6 Q When did the chest pain start? 7 A I want to think earlier this year. Maybe around 8 January or so. I started having increased anxiety and 9 heart rate -- fast heart rate. Palpitations, maybe. 10 Sweaty palms. 11 And then we had the pandemic. So we're having to 12 wear masks, suffocating with all this stuff covered up. 13 Yes, I started having shortness of breath. And, yes, 14 chest pain, like hurt chest. Not just the heart beating 15 fast. 16 Q So now that we're kind of short on time, I'm 17 going to quickly ask you have you been hospitalized in the 18 past fifteen years? 19 A No. 20 Q Aside from the urgent care in Long Beach and Dusk 21 to Dawn Urgent Care, have you been to any other urgent 22 care in the last fifteen years? 23 A No. 24 Q No? 25 A No.</p>
<p style="text-align: right;">99</p> <p>1 anti-inflammatory. But I never got it. So I don't recall 2 why I didn't receive the medication. 3 Q Did you never pick it up or you -- 4 A I might have not picked it up because I just 5 don't like to take all the medicine if I can help it. 6 Q So you try to avoid medicine, but you do take 7 your ativan and Tylenol; right? 8 A Well, I take Tylenol. 9 I have used the ativan in the past. I did have 10 to use one last week. But at the moment, I don't even 11 have any more. 12 Q So you do take some medicine. Why did you choose 13 not to take the anti-inflammatory? 14 A Because of the side effects that -- yeah. I 15 believe, when he offered it to me, I'm like, no. I'm very 16 particular with the side effects of the medication. 17 Q So going back to your current complaints, we 18 talked about orthopedic. Can you briefly tell me what 19 other complaints you have, like work-related injuries or 20 complaints? So we talked about the head, shoulders, the 21 orthopedic aspect. 22 A Okay. 23 Q Any other complaints? 24 A As far as affecting me like stress? Stress, yes. 25 So anxiety. A lot of stress, overwhelming.</p>	<p style="text-align: right;">101</p> <p>1 Q Have you been -- 2 A And fifteen years is a long time. I don't 3 recall. I don't think so, though. Fifteen years is a 4 long time. 5 Q All right. What if I limit it to ten? Do you 6 remember if you had been to any other -- 7 A An urgent care? No. No, I don't believe so. 8 Q Then in the last ten years, have you gone to the 9 emergency room for any reason? 10 A No. 11 Q Perfect. 12 Have you ever had any surgeries? 13 A No. 14 Q Do you have any ongoing medical problems that 15 you've had to deal with aside from the work-related? 16 A No. 17 Q No diabetes? 18 A No. 19 Q Scoliosis? 20 A No. 21 Q Arthritis? 22 A No. 23 Q High blood pressure? 24 A I had episodes of elevated blood pressure. 25 Q When did that first start?</p>

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1 MS. FOLEY: Counsel, I apologize. It's 5:00. I
 2 cannot really go past 5:00.
 3 MS. KHANYAN: Okay. Let me ask my last question.
 4 Q Have you been involved in any motor vehicle
 5 accidents in the past fifteen years?
 6 A Fifteen years. No.
 7 Q And I kind of cut you off on -- we kind of cut
 8 you off on your answer to the last question.
 9 A Sure.
 10 Q You said episodes of elevated high blood
 11 pressure. My question that was pending was when did that
 12 first start?
 13 A Maybe about January of this year. Maybe, yeah.
 14 Q So it wasn't -- it was January of 2020?
 15 A Yes, 2020. That's what made me go to the doctor
 16 sometimes.
 17 Q Have you filed any other workers' compensation
 18 injuries in the past?
 19 A No.
 20 MS. KHANYAN: I have no further questions.
 21 Counsel, if you have some follow-up --
 22 MR. GARCIA: I have lots of questions, but we're not
 23 going to get to them today.
 24 THE WITNESS: Please, no.
 25 MS. KHANYAN: So then we will -- I reserve my right to

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1 Volume II. I think we discussed a potential date on
 2 December 4 for counsel to take the deposition. Counsel,
 3 I'll wait for your e-mail.
 4 And aside from that, I think we're ready to go
 5 off because we're done.
 6 MR. GARCIA: Just do the regular stipulations?
 7 MS. FOLEY: So stipulated. Oh. You want to read your
 8 regular stipulation?
 9 MS. KHANYAN: Since I'm not done, I won't do the full.
 10 I'll just say, due to time constraints, we're adjourning
 11 today at this time due to the time constraints. As
 12 applicant's deposition is not completed, I reserve my
 13 right on Volume II at a mutually convenient time.
 14 MS. FOLEY: So stipulated.
 15 MS. KHANYAN: So stipulated.
 16 (At the hour of 5:03 p.m.,
 17 the proceedings were adjourned.)
 18
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1 I declare under penalty of perjury that the
 2 foregoing is true and correct. Subscribed this
 3 _____ day of _____, 2020, at
 4 _____.
 5
 6
 7
 8 _____
 9 ANISA MICHELLE CHANEY
 10
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1 CERTIFICATE
 2
 3 I, Liza Padilla, CSR No. 14014, a Certified Shorthand
 4 Reporter within and for the State of California, do hereby
 5 declare:
 6 That pursuant to 2093(b) CCP, I remotely administered
 7 the oath to the deponent;
 8 That the foregoing deposition was taken before me
 9 remotely at the time and place set forth and was taken
 10 down by me in shorthand and thereafter transcribed into
 11 typewriting under my direction and supervision;
 12 That the foregoing deposition is a full, true, and
 13 correct transcript of my shorthand notes so taken;
 14 I further declare that I am neither counsel for nor
 15 related to any of the parties to said action, nor in any
 16 way interested in the outcome thereof.
 17 I declare under penalty of perjury this 25th day of
 18 November, 2020, that the foregoing is true and correct.
 19
 20
 21 _____
 22 LIZA PADILLA, CSR NO. 14014
 23 CERTIFIED SHORTHAND REPORTER
 24 FOR THE STATE OF CALIFORNIA
 25

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