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WORKERS' COMPENSATION APPEALS BOARD

STATE OF CALIFORNIA

_____)

BENETIA YOUNG,)

Applicant,)

vs.) CASE NO. ADJ11334762

KEDREN COMMUNITY HEALTH CENTER)

INC.; REDWOOD FIRE AND)

CASUALTY INSURANCE COMPANY C/O)

BERKSHIRE HATHAWAY HOMESTATE)

COMPANIES,)

Defendants.)

_____)

DEPOSITION OF BENETIA YOUNG, an applicant
herein, noticed by Harrigan Polan & Kaplan,
taken at 4640 Admiralty Way, 5th Floor, Marina
del Rey, California, at 2:32 p.m., Tuesday,
July 31, 2018, before Paulette Radcliff, CSR
12111.

Job No.: 482325

1 APPEARANCES OF COUNSEL:

2

For Applicant:

3

LAW OFFICES OF NATALIA FOLEY
4 BY: NATALIA FOLEY
8306 Wilshire Boulevard, Suite 115
5 Beverly Hills, California 90211
310-707-8098

6

7 For Defendant:

8

HARRIGAN POLAN & KAPLAN
9 BY: CHANTE M. MEZZERA
70 South Lake Avenue, Suite 925
Pasadena, California 91101
10 415-675-5462

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I N D E X

WITNESS: BENETIA YOUNG

EXAMINED BY:	PAGE
Ms. Mezzera	4

E X H I B I T S

(NONE)

1 BENETIA YOUNG,
2 having been first duly sworn, was examined and
3 testified as follows:
4

5 EXAMINATION

6 BY MS. MEZZERA:

7 Q. Good afternoon. My name is Chante Mezzera.
8 I am the attorney representing the insurance company
9 Redwood Fire Casualty Insurance Company, care of
10 Berkshire Hathaway Homestate Companies regarding the
11 workers' compensation claim you have filed against
12 Kedren Community Center. Pursuant to our off the
13 record discussion, Ms. Young, I am going to ask you a
14 few questions. The first question is when did you
15 last work for Kedren?

16 A. December 31st.

17 Q. Of 2016?

18 A. Yes.

19 Q. Did you work there in 2017?

20 A. No.

21 Q. Did you work there in 2018?

22 A. No.

23 Q. Did you work anywhere in 2017?

24 A. No.

25 Q. Did you work anywhere in 2018?

1 A. Yes.

2 Q. Where did you work in 2018. Los Angeles
3 Youth Network, located at 2471 North Beachwood Drive,
4 Los Angeles, California 90068?

5 A. Yes.

6 Q. You worked there from about January 22, 2018
7 to March 9, 2018?

8 A. Yes.

9 Q. But you last worked for Kedren December 31,
10 2016 and have not worked there since?

11 A. Yes.

12 Q. And that is the Kedren located at 4211 South
13 Avalon, Los Angeles, California 90011?

14 A. Yes.

15 Q. So based on an hour discussion and your
16 testimony applicant's attorney and I have discussed
17 that the proper carrier for Kedren in 2016 appears to
18 have been the insurance company of the state of
19 Pennsylvania. I have provided to applicant's attorney
20 the WCIRB reflecting that information. The parties
21 have agreed that it would be up to applicant's
22 attorney to file an amended application accordingly,
23 whether it be against Kedren or the most recent
24 employer Los Angeles Youth Network, but nonetheless,
25 the parties have agreed that Berkshire Hathaway is not

1 the proper carrier based on the dates of employment at
2 Kedren as compared to the dates of injury alleged in
3 the application for adjudication, and then on that
4 basis applicant's attorney has agreed to a voluntary
5 dismissal of Redwood Fire Casualty Insurance Company,
6 care of Berkshire Hathaway Homestate Company, a
7 dismissal with prejudice. The parties will coordinate
8 to obtain a mutually convenient time in order to walk
9 through the dismissal without prejudice?

10 MS. MEZZERA: Unless you have anything else.

11 MS. FOLEY: So stipulated.

12 MS. MEZZERA: We will relieve the court
13 reporter of her duties. The original transcript will
14 go to applicant's attorney for the applicant to review
15 and make any changes, if necessary, within 45 days. A
16 certified copy will come to defense counsel. Should
17 the original be signed within the stipulated time
18 period or otherwise lost or destroyed, stolen or
19 becomes otherwise unavailable, a certified copy maybe
20 used for any purpose that the original maybe used for.

21 MS. FOLEY: So stipulated.

22 (The proceedings concluded at 2:43 p.m.)

23

24

25

1 STATE OF CALIFORNIA) ss

2 I, Paulette Radcliff, CSR 12111, do hereby

3 Declare:

4

5 That, prior to being examined, the witness named in
6 the foregoing deposition was by me duly sworn pursuant
7 to Section 2093(b) and 2094 of the Code of Civil

8 Procedure:

9

10 That said deposition was taken down by me in
11 shorthand at the time and place therein named and
12 thereafter reduced to text under my direction.

13

14 I further declare that I have no interest in the
15 event of the action.

16

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


20

21 WITNESS my hand this 23rd day of

22 August, 2018.

23

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Paulette Radcliff, CSR 12111

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ERRATA SHEET

I declare under penalty of perjury that I have read the
foregoing _____ pages of my testimony, taken
on _____ (date) at
_____(city), _____(state),
and that the same is a true record of the testimony given
by me at the time and place herein
above set forth, with the following exceptions:

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24			Signature of Witness		
25			_____		
			Name Typed or Printed		