

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

4	DARLENE WALLS,	)	
		)	
5	Applicant,	)	
		)	
6	vs.	)	No. ADJ11859979
		)	ADJ13026215
7	KAISER FOUNDATION HOSPITAL,	)	ADJ11864576
		)	ADJ13026225
8	Defendant.	)	
	_____	)	

VIDEOCONFERENCE DEPOSITION OF DARLENE WALLS  
Inglewood, California  
Thursday, July 16, 2020

Reported by:  
LORI M. BROWN  
CSR No. 12614  
JOB No. 172654

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		)	ADJ13026225
8	Defendant.	)	
	_____	)	

14 Videoconference Deposition of DARLENE WALLS,  
15 taken on behalf of Defendant, at 8407 Crenshaw Boulevard,  
16 Unit D, Inglewood, California, beginning at 10:11 a.m.  
17 and ending at 11:38 a.m. on Thursday, July 16, 2020,  
18 before LORI M. BROWN, Certified Shorthand Reporter  
19 No. 12614.

1 REMOTE APPEARANCES:

2

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WITNESS

EXAMINATION

DARLENE WALLS

BY MR. BROWN

5

EXHIBITS

(None)

1 Inglewood, California, Thursday, July 16, 2020

2 10:11 a.m. - 11:38 a.m.

3

4 THE REPORTER: Before we begin, will counsel  
5 stipulate to the swearing in of the witness remotely?

6 MR. BROWN: Yes.

7 MS. FOLEY: Yes.

8

9 DARLENE WALLS,

10 having been first duly sworn, was examined and testified  
11 as follows:

12

13 EXAMINATION

14 BY MR. BROWN:

15 Q Good morning, Ms. Walls. My name is Greg Brown,  
16 and I represent Kaiser in your worker's compensation  
17 claims.

18 Can you state your full legal name. Ms. Walls,  
19 can you hear me?

20 A No, I didn't hear you.

21 Q My name is Greg Brown, and I represent Kaiser in  
22 your worker's comp claims.

23 Can you state your full legal name for me.

24 A Darlene Walls.

25 Q Have you ever gone by any other names?

1 A No.

2 Q And do you understand that you're under penalty  
3 of perjury and you have to tell me the truth here today?

4 A Yes.

5 Q And you'll do that?

6 A Yes.

7 Q Basic ground rules to make this go smoothly. The  
8 first is, if you can just give yourself a mental pause  
9 before you answer because we don't want to talk over each  
10 other. And if I ask you a question and your attorney  
11 might want to object to something I ask for a variety of  
12 reasons, giving yourself that pause allows your attorney  
13 time to make the objection as well.

14 Do you understand that?

15 A Yes.

16 Q So you'll do that?

17 A Yes.

18 Q So we can't see you just due to some technical  
19 issues. Perfectly acceptable. But if you're shaking your  
20 head up and down or side to side, if you don't say it, the  
21 court reporter doesn't take it down. So you always have  
22 to give us a verbal answer.

23 Do you understand that?

24 A Yes.

25 Q Additionally, if you go "uh-huh" or "uh-uh," you

1 know, I think I can tell the difference, but they're going  
2 to look almost the same on the record. I'm going to say  
3 you mean this. Your attorney's going to say no, no, she  
4 meant that. And it doesn't clarify anything.

5 Do you understand that?

6 A Yes.

7 Q I'm going to ask you a lot about events that  
8 happened in the past, your medical record, history,  
9 doctors you've seen, places you've been, blah, blah, blah.  
10 So I don't expect you to have a perfect memory. So if I  
11 ask you a question and you don't know the answer, don't  
12 make it up just to give me an answer. It's okay to say "I  
13 don't recall."

14 Do you understand that?

15 A Yes.

16 Q So at the same time, I'm entitled to your best  
17 estimate. What that means is say, Hey, Ms. Walls, do you  
18 remember when the event -- whatever happened? I don't  
19 remember the exact date, but I do remember it was around  
20 Christmas. That's an estimate.

21 Do you understand that? Did you hear me?

22 A Yes.

23 Q So you understand what I mean by an estimate?

24 A Yes.

25 Q And you'll give me your best estimate here today?

1           A     Yes.

2           Q     And if you need to take a moment to think about  
3 something, hey, that's fine.  Nobody goes through life  
4 expecting to testify at a deposition later.  But we do  
5 want your best testimony here today.  And I'm going to  
6 explain to you why that matters.

7                     If you give me an answer and then when you're  
8 reviewing the transcript you change it, I could say, you  
9 know, "Well, she's saying one thing, and she was saying  
10 something else, so how credible is she?"

11                    Does that make sense to you?

12          A     Yes.

13          Q     Additionally, when you're reviewing the  
14 transcript you make a lot of changes because you don't  
15 give us your best testimony here, I can say, "Well, how  
16 good is her memory if she has to make this many changes?"  
17 And that could also negatively affect your credibility.

18                    Does that make sense to you?

19          A     Yes.

20          Q     Do you understand that I'm not actually here to  
21 torture you and we're just trying to get information so  
22 that we can better address the merits of your workers'  
23 comp claims?  Is that a yes?

24          A     Yes.

25          Q     And to that end, if you need to take a break,



1 that's fine, but we can't read your mind. You just have  
2 to let us know if you need a break. And we'll take five  
3 minutes, however long you need.

4 So if you need a break, will you let us know?

5 A Yes.

6 Q If at any point I ask you a question and you want  
7 clarification, will you let me know?

8 A Yes.

9 Q If at any time I ask you a question and you find  
10 it to be confusing, will you let me know?

11 A Yes.

12 Q If at any point I ask you a question and you  
13 didn't hear it properly or you want it repeated, will you  
14 let me know?

15 A Yes.

16 Q And that's important. Don't feel like you're  
17 insulting anybody or -- if you want us to repeat it or you  
18 want any of that, you have to let us know because we're  
19 going to assume you understood what you answered if you  
20 don't ask for any clarification or additional information.

21 Do you understand that?

22 A Yes.

23 Q Have you consumed any drugs, alcohol, or other  
24 intoxicating substances that would impair your ability to  
25 testify truthfully and accurately here today?

1 A No.

2 Q Have you consumed any prescription medications in  
3 the last 24 hours?

4 A Yes.

5 Q What are those?

6 A A pain pill.

7 Q Who gave that to you?

8 A My doctor.

9 Q Dr. Kaiser or a workers' comp doctor?

10 A Dr. Kaiser.

11 Q Dr. William Kaiser.

12 A Dr. Hong.

13 Q And is Dr. Hong your primary care physician with  
14 your Kaiser health plan?

15 A Yes.

16 Q And where are you having the pain that you take  
17 the pain pill for?

18 A Lower back and left wrist.

19 Q Any other prescription medications?

20 A Yes.

21 Q What else?

22 A High blood pressure.

23 Q Who gave you that?

24 A Dr. Hong.

25 Q Any other prescription medications?

1 A Napryn.

2 Q What do you take that for?

3 A For pain.

4 Q Pain where?

5 A Lower back, wrist, shoulder.

6 Q Also Dr. Hong?

7 A Yes.

8 Q Any other prescriptions?

9 A No.

10 Q Do you have any prescriptions that you don't  
11 necessarily take every day but on an as-needed basis?

12 A Yes.

13 Q What are those?

14 A Motrin, 800.

15 Q Anything else?

16 A That's it.

17 Q Do you take any over-the-counter or herbal  
18 supplements?

19 A Vitamin.

20 Q What do you take the vitamins for?

21 A Just a daily vitamin.

22 Q Like a multivitamin?

23 A Yes.

24 Q And what's your birthday?

25 A March 23rd, 1967.

1 Q And where were you born?

2 A Los Angeles, California.

3 Q Ms. Foley gave me your driver's license number.

4 What's your current height, weight?

5 A Five-seven.

6 Q Weight?

7 A One seventy.

8 Q What type of car do you drive?

9 A A Buick, white, Alero.

10 Q And is that A-l-e-r-o, Alero?

11 A Yes.

12 Q Is that a sedan?

13 A Yes.

14 Q And you said that you're living at the 8407

15 Crenshaw Boulevard address now?

16 A Yes.

17 Q How long have you lived there?

18 A A year.

19 Q Does anybody live there with you?

20 A Yes.

21 Q Who lives there with you?

22 A Daughter, son-in-law, grandson.

23 Q Who's primarily responsible for the rent?

24 A Daughter and son-in-law.

25 Q Do you help take care of the grandkid?

1 A Yes.

2 Q How old is your grandson?

3 A Thirteen.

4 Q So he doesn't need the butt wiping anymore? I  
5 have a three-year-old, so --

6 Are you currently married?

7 A No.

8 Q Have you ever been married?

9 A Yes.

10 Q So you're currently divorced?

11 A Yes.

12 Q When did you get divorced?

13 A 2008.

14 Q Only been married once? Only been divorced once?

15 A No.

16 Q You were married before?

17 A Yes.

18 Q How many marriages total?

19 A Two.

20 Q And when did the first marriage start and end?

21 A 1992 to 1999. Don't recall the --

22 Q And the second marriage, when did that start?

23 A 2005.

24 Q And the cause for the divorce in the first  
25 marriage was what?

1 A Don't recall.

2 Q You don't recall the reason for the divorce?

3 A No.

4 Q Did you divorce him, or did he divorce you?

5 A I divorced him.

6 Q Do you recall why you divorced him?

7 A I don't recall.

8 Q Okay. How about the second marriage, the one  
9 where you got divorced in 2008? Did you divorce him, or  
10 did he divorce you?

11 A He divorced me.

12 Q Do you know why?

13 A Unreconcilable differences.

14 Q Can you tell me in less complicated legal terms  
15 what unreconcilable differences you had that led to the  
16 divorce?

17 A Disagreement.

18 Q Over?

19 A Finance.

20 Q He wanted to spend more money, or he thought you  
21 were spending too much money?

22 A Me spending too much.

23 Q And Ms. Walls, I apologize that I'm asking kind  
24 of personal questions, but whenever you file a psychiatric  
25 claim, you know, the full -- we've got to get into

1 everything. And you know, they're kind of, you know,  
2 unnecessarily personal questions, but it's the same type  
3 of things that are going to get asked to you by a  
4 psychiatrist. You're going to have an evaluation by a  
5 doctor off a state panel list. And a whole life comes  
6 into play. So I'm not trying to be rude. I'm just trying  
7 to give you some context.

8 Does that make sense?

9 A Correct.

10 MS. FOLEY: Counsel, we discussed with the  
11 applicant. So she's aware of that, and she understands  
12 that it's part of the procedure.

13 BY MR. BROWN:

14 Q All right. In that same vein, you spent time  
15 preparing with your attorney before today's deposition; is  
16 that correct?

17 A Yes.

18 Q Approximately how long did you spend preparing  
19 before today's deposition?

20 A An hour.

21 MR. BROWN: Counsel, does that sound correct?

22 MS. FOLEY: Yeah, that's accurate.

23 BY MR. BROWN:

24 Q Okay. So you lived in Bellflower prior to the  
25 current address on Crenshaw; is that correct?

1 A Yes.

2 Q How long did you live at the address on  
3 Bellflower?

4 A Approximately eight years.

5 Q Did you live there by yourself?

6 A Yes.

7 Q Nobody cohabited with you?

8 A My son visited. My mom stayed a little bit.

9 Q How many kids do you have?

10 A Four.

11 Q How old are they?

12 A Thirty-six, thirty-five, thirty-one, thirty-two.

13 Q You went to high school?

14 A Yes.

15 Q You graduated from high school?

16 A Yes.

17 Q Where at?

18 A It was a continuation. Downtown Metropolitan.

19 Q Any other higher education?

20 A Yes.

21 Q Where at?

22 A Harbor College.

23 Q Certificate program? AA degree?

24 A Certificate program.

25 Q In what?



1 A Early education.

2 Q Any other higher education?

3 A No.

4 Q Have you ever served in the military?

5 A No.

6 Q Have you ever been convicted of any crimes?

7 A No.

8 Q Have you ever been arrested?

9 A Yes.

10 Q Just once or more than once?

11 A Once.

12 Q Can you describe what happened?

13 A Warrants.

14 Q Did you have some sort of unpaid ticket or  
15 failure to appear at, like, a jury summons something like  
16 that?

17 A Yes.

18 Q How much time did you spend behind bars?

19 A Five days.

20 Q And this was approximately when?

21 A Early '90s.

22 Q Okay. So we've got the workers' comp claims that  
23 we're here for today. We have both your allegation of an  
24 orthopedic injury, which is accepted, for your back and  
25 your left wrist. Then we also have the psych, the hostile

1 work environment, stress claim.

2 Besides those two, have you ever had any other  
3 prior workers' comp claims?

4 A No.

5 Q For any employer?

6 A No.

7 Q How about any other lawsuits of any type? Has  
8 anyone either sued you or you sued anyone in the past for  
9 any reason?

10 A No.

11 Q Have you ever filed for bankruptcy?

12 A No.

13 Q Have debt collectors ever harassed you or set any  
14 wage garnishments against you?

15 A Yes.

16 Q What was the largest debt that you owed?

17 A Fifteen thousand.

18 Q What was that for?

19 A A car.

20 Q Did you have the car repossessed?

21 A Yes.

22 Q Have you had more than one car repossessed?

23 A Yes.

24 Q How many cars have you had repossessed?

25 A Two.

1 Q Do you currently have any outstanding debts for  
2 which debt collectors are attempting to collect payment?

3 A Yes.

4 Q To the best of your knowledge, what are those  
5 debts? How much are they, and what's your status on them?

6 A It's a recurring of a car that I paid. It was  
7 15,000, and I paid 7,000 on it. I'm fighting that.

8 Q Anything else?

9 A No.

10 Q Have you ever enrolled in a debt consolidation or  
11 any credit counseling services?

12 A Yes.

13 Q When was the most recent time that you enrolled  
14 in credit counseling or debt consolidation?

15 A December 2019.

16 Q And that was related to the outstanding  
17 approximately \$8,000 on that car?

18 A No.

19 Q What was that in relation to?

20 A Credit cards.

21 Q Approximately how much credit card debt did you  
22 consolidate?

23 A About 7,000.

24 Q And you're making payments on that now?

25 A Yes.

1 Q And how much do you have to pay every month for  
2 the credit card debt?

3 A Eighty-nine dollars.

4 Q Are you aware of what your current credit score  
5 is?

6 A Yes.

7 Q What is it?

8 A Six eighty.

9 Q Have you ever had a mortgage?

10 A No.

11 Q At any point in your life have you ever been  
12 involved in a motor vehicle accident, both as a passenger  
13 and as a driver?

14 A Yes.

15 Q In any of the motor vehicle accidents that you've  
16 been involved in, did you have to seek medical treatment  
17 as a result of the motor vehicle accident?

18 A Yes.

19 Q Have you had to seek medical treatment for more  
20 than one accident or more than one?

21 A One.

22 Q Can you describe the circumstances of the  
23 accident you got hurt and had to get medical treatment?

24 A Passenger on the freeway, and someone hit the  
25 side rear, left side rear.

1 Q Approximately what year was this?

2 A Don't recall.

3 Q More or less than ten years ago?

4 A More.

5 Q What part of your body did you injure in this car  
6 accident?

7 A Lower back.

8 Q What sort of medical treatment did you get as a  
9 result of the car accident?

10 A Physical therapy.

11 Q Did you have to miss any time from work?

12 A I'm not sure. I don't recall.

13 Q Do you recall where you were working at the time  
14 of this motor vehicle accident?

15 A I don't recall.

16 Q So it was before your time at Kaiser? Darlene?

17 A Yes.

18 Q So just to confirm, the motor vehicle accident  
19 where you hurt your low back, got physical therapy, to the  
20 best of your recollection, did that happen before you  
21 started working at Kaiser, or you just don't remember?

22 A It was before.

23 Q And at any point, feel free -- you can call me  
24 Greg if you need to ask me any questions.

25 Any other sort of injuries of that nature where

1 you've had to go and get medical treatment, like a  
2 slip-and-fall in the grocery store, sports injury,  
3 anything like that?

4 A No.

5 Q Now, I want to talk about your orthopedic  
6 injuries. Those are your stress, psych issues.

7 So I understand that you've got pain in your  
8 lower back; is that correct?

9 A Yes.

10 Q You've got left wrist pain?

11 A Yes.

12 Q What other parts of your body do you think are  
13 related to this mechanism of injury?

14 A Right shoulder.

15 Q Okay. What else?

16 A And right leg pain.

17 Q Did you just say "right leg pain"?

18 A Yes.

19 Q And I'm asking you just in your own personal  
20 opinion. I'm not asking for a medical opinion.

21 When you say "right leg pain," do you get pain  
22 that shoots into your leg from your lower back, or is it a  
23 different type of pain?

24 A From my right leg up to my back.

25 Q Because I'm just trying to figure out if the pain

1 in your right leg is because your leg hurts or it's  
2 because that's just a symptom of the lower back pain and  
3 it's just a shooting pain into your leg.

4 A Lower back pain.

5 Q And do you only get pain on the right side, or is  
6 the right side just worse than the left side?

7 A Right side is worse than the left side.

8 Q So oftentimes with back injuries people feel more  
9 pain or more symptoms with increased activity. So you  
10 have a busy day going to the grocery store, you're on your  
11 feet a lot.

12 Does doing those sort of things increase the  
13 symptoms you have with the back pain, or is it essentially  
14 constant no matter what's going on? Darlene, did you hear  
15 me?

16 A Yes. I said it increased. You didn't hear me?

17 Q No, I didn't hear. I apologize. Would you mind  
18 repeating?

19 A It increased.

20 Q So the pain and the variety of symptoms you have  
21 increases with activity?

22 A Yes.

23 Q Do you notice any one particular activity makes  
24 it worse than others, like walking's usually fine, but if  
25 I have to bend down, that's what really makes it come on?

1 A Yes.

2 Q What makes it worse?

3 A Bending down, sitting too long, walking too long.

4 Q So -- and please let me know if this is correct  
5 because I don't want to put words in your mouth because  
6 I'm trying to figure out the extent of the issue.

7 So do you feel like you can do everything you  
8 could do before, but it's the, you know, I could bend down  
9 one time to pick up a shoe, but if I have to do it again,  
10 you know, it's that second time or third time that makes  
11 increased symptoms?

12 A No. It's -- no.

13 Q So you don't feel like you could do everything  
14 you could before?

15 A Not without pain.

16 Q And in particular, can you list some things that  
17 you feel like you aren't able to do anymore because of  
18 your back pain?

19 A Mopping, dancing, carrying my grandbaby, picking  
20 her up.

21 Q Okay. Any other parts of your body  
22 orthopedically that you feel like we haven't talked about?

23 A No.

24 Q And in the last ten years, have you received  
25 medical treatment for your low back anywhere but at Kaiser



1 or in connection with this workers' comp case?

2 A No.

3 Q Same thing for your left wrist?

4 A No.

5 Q Same thing for your right shoulder?

6 A No.

7 Q Okay. I want to talk about your right shoulder.

8 It looks like you've been having issues with the right

9 shoulder since -- just a second -- 2015.

10 Do you recall going and seeing somebody for

11 problems with your right shoulder in 2015?

12 A Yes.

13 Q Do you recall being diagnosed with bursitis of

14 the right shoulder?

15 A (No verbal response.)

16 Q It's entirely believable that the doctor might

17 not have told you everything that's in the medical

18 reports, by the way. So if I ask you a question about a

19 medical report you don't know, there's nothing not

20 credible about it. Doctors don't always tell you

21 everything, so --

22 Did you get injections in the right shoulder to

23 see if that helped you?

24 A Can you repeat that?

25 Q Did you get injections in your right shoulder to

1 see if that helped you feel better?

2 A I have in the past.

3 Q Do you recall getting an MRI done of your right  
4 shoulder?

5 A Yes.

6 Q And do you recall that that showed a small tear  
7 in your right shoulder?

8 A Yes.

9 Q Do you recall if you were ever taken off work  
10 directly because of your right shoulder? Hey, Darlene, if  
11 you said anything, we didn't hear you.

12 A Oh. Yes.

13 Q You were taken off of work because of your right  
14 shoulder?

15 A Yes.

16 Q Do you recall approximately -- and all I'm  
17 looking for is an estimate. Do you recall approximately  
18 when that was?

19 A It was around approximately -- I don't know. I  
20 wasn't actually taken off, but they gave me a leave, like,  
21 two days a month to rest, you know, through my --

22 Q Is that some sort of modified duty?

23 A Yes. Like, I was granted two days a month to  
24 rest my shoulder, and I've never ever been off completely.

25 Q Do you recall, was that last year, or was that

1 around 2016 when you got the injections?

2 A From '16.

3 Q And in 2016, do you recall, did the doctor tell  
4 you the cause of your right shoulder issues? Did he say  
5 it was related to work, it was related to something else?

6 A Work, competitive (as spoken) use.

7 Q Repetitive use?

8 A Yes.

9 Q Okay. So briefly talk about psych past medical  
10 treatment. You've seen Dr. Flores.

11 Do you recall seeing him in connection with your  
12 workers' comp case?

13 A Over the phone interview.

14 Q Did he give you some testing?

15 A Yes.

16 Q Have you seen anybody else at any point in your  
17 life for psychologist, counselors, therapists?

18 A Yes.

19 Q When was the first time in your life you ever saw  
20 somebody for mental health treatment or mental health  
21 issues?

22 A Does that consider therapy? Mental health?

23 Q Sure. If you saw a therapist for, you know,  
24 personal issues you were having.

25 A Probably 2008. Can you hear me?

1 Q I can hear you.

2 A Okay.

3 Q Was that somebody with Kaiser?

4 A Yes.

5 Q Before Kaiser, had you ever seen anybody for  
6 mental health treatment or mental health issues at any  
7 point in your life prior to having Kaiser health  
8 insurance?

9 A No.

10 Q So any psych treatment that you've ever received  
11 is either going to be in your Kaiser records or with  
12 Dr. Flores; is that correct?

13 A Yes.

14 Q At any point in your life, have you ever been  
15 addicted to any substances?

16 A No.

17 Q When you went to see somebody at Kaiser in 2008  
18 for therapy, was that related to marital issues?

19 A Yes.

20 Q Have you gone to see anybody at Kaiser for mental  
21 health issues related to anything else?

22 A Yes.

23 Q And what were those issues?

24 A Stress on the job.

25 Q And you went to see somebody with Kaiser mental

1 health for that?

2 A Yes.

3 Q Do you know approximately -- and I'm just looking  
4 for generally a year -- the first time you went to see  
5 somebody for stress related to the job?

6 A 2016.

7 Q So I see a note from 2011. And it looks like you  
8 went to an urgent care. And some of the notes -- and  
9 again, I'm not saying that this is accurate. I'm just  
10 bringing this up to see if this refreshes your  
11 recollection. Has pending court case as a witness in  
12 armed assault. Poor sleep. Toss and turning. Feels job  
13 stress, finance issues. Has been ongoing for two months,  
14 blood pressure up. Recently under stress.

15 Do you recall going to see urgent care about that  
16 issue in 2011?

17 A Oh, yes. That was -- yes. Did you hear me?

18 Q I heard yes, oh, yes in there. I heard a little  
19 something garbled.

20 A Yes. Yes.

21 Q So you recall being a witness to some sort of  
22 armed assault where you had to testify?

23 A Yes.

24 Q Is that the only time you've testified as a  
25 witness in a court case?

1 A Yes.

2 Q Just so -- I'm looking at the records too. I  
3 also see a visit in October of 2012 about a week before  
4 Halloween. Complains of stress at work. Excessive  
5 workload. Given days off. Has been followed by psych.  
6 Has returned to full duty.

7 Do you recall that?

8 A Yes.

9 Q Okay. Are you currently working?

10 A No.

11 Q When was the last day you worked at Kaiser?

12 A February 13.

13 Q And were you taken off of work on February 13th  
14 of this year?

15 A Yes.

16 Q Who took you off work?

17 A My lawyer's doctor.

18 Q Do you recall the name of that doctor?

19 A It's breaking up. Can you repeat it?

20 Q Do you recall the name of that doctor?

21 A Dr. Iseke. I don't know if I'm pronouncing the  
22 name right.

23 MS. FOLEY: It's Dr. Iseke.

24 MR. BROWN: I-s-e-k-e?

25 MS. FOLEY: I-s-e-k-e. That's right. Yes.

1 MR. BROWN: Can we go off the record?

2 MS. FOLEY: Sure.

3 (Recess.)

4 MR. BROWN: We're back on the record after a  
5 quick break. All parties are present and able to  
6 communicate over the Zoom deposition proceedings.

7 BY MR. BROWN:

8 Q So you've been off work since February of this  
9 year when a physician you were referred to by your  
10 attorney took you off work; is that correct?

11 A Yes.

12 Q Are you currently receiving benefits from the  
13 Employment Development Department, EDD?

14 A Yes.

15 Q You get a little -- like a debit card?

16 A No.

17 Q No?

18 A No.

19 Q They actually send you cash?

20 A A check.

21 Q Oh, they send you a check?

22 A Uh-huh.

23 Q Is that a yes?

24 A Yes.

25 Q Do you get a check every two weeks?

1 A Yes.

2 Q And do you know how much you get every two weeks?

3 A Yes.

4 Q How much do you get?

5 A Fifteen ninety-eight.

6 Q Have you ever received EDD in the past, or is  
7 this the first time you've gotten EDD?

8 A With this company -- yes, in the past, but not  
9 through Kaiser, no.

10 Q You've gotten EDD in the past when you've worked  
11 for someone else?

12 A Yes.

13 Q Was that for unemployment or for disability?

14 A Unemployment.

15 Q So this is the first time you've gotten EDD for  
16 disability, or have you gotten it in the past?

17 A First time.

18 Q You still have Kaiser health insurance?

19 A Can you repeat that? It broke up.

20 Q Do you still have Kaiser health insurance?

21 A Yes.

22 Q And you've had Kaiser health insurance since  
23 about 2008; is that correct?

24 A Yes.

25 Q Have you had any other health insurance since



1 2008?

2 A Repeat that again.

3 Q Have you had any other health insurance since  
4 2008?

5 A No.

6 Q What department did you work in in Kaiser?

7 A Med-surg tele.

8 Q And your job position when you stopped working in  
9 February is what?

10 A CNA nurse attendant.

11 Q How long have you been a CNA for?

12 A Fourteen years.

13 Q I think I heard 14 years; is that correct?

14 A Yes.

15 Q In your entire time at Kaiser, have you been a  
16 CNA?

17 A Yes.

18 Q Have you been a CNA in the same department, or  
19 have you bounced around different departments?

20 A I have bounced around.

21 Q How long have you been in the med-surg unit that  
22 you're currently a part of? Hey, Darlene, I didn't hear  
23 you.

24 A I worked another department.

25 Q How long have you been in the med-surg department

1 that you're in now?

2 A Seven years.

3 Q During that time frame, have you ever received  
4 any corrective action notices?

5 A Within the seven years?

6 Q Yes.

7 A Yes.

8 Q When was the most recent one?

9 A 2017.

10 Q And what was that for?

11 A Attendance.

12 Q Do you know what level?

13 A One.

14 Q Have you ever had anything higher than a 1?

15 A In 2009.

16 Q Just so we're on the same page, the correction  
17 action notice is a write-up by Kaiser, and there's levels  
18 of severity from a 1, you know, do better, but it's  
19 probably not that big of a deal, to a 5, which is a  
20 termination.

21 So level 1 is the lowest level on the corrective  
22 action notice scale; is that correct?

23 A Prior to 2000 -- I think it was '9 or '10, it was  
24 a higher level.

25 Q But in the last ten years, the highest level

1 you've been on is a level 1, and it was just related to  
2 attendance issues, correct?

3 A Correct.

4 Q So in your department, did you have any  
5 interpersonal problems with anybody that -- you know, if I  
6 was to go interview people in the department, ask about  
7 you or you've got some sort of personal beef that somebody  
8 would make stuff up about you or lie about you because of  
9 a personal problem?

10 A Personal?

11 Q Yeah. Just trying to figure out if there's  
12 anybody that if I hear their side of the story I should be  
13 skeptical that they're telling the truth because there's  
14 some sort of interpersonal issue between the two of you.

15 A Yes.

16 Q And who would that be?

17 A Michelle Lamberg.

18 Q Anybody else?

19 A Just a minute. Let me think of her name. Siony.  
20 But I don't know her last name.

21 Q I'm going to take a stab. How do you spell that?  
22 Siony?

23 A Siony, S-i-o-n-y.

24 Q What problems did you have with Michelle that --  
25 or what problems did she have with you that made you think

1 that she wouldn't be a truthful witness?

2 A You want me to describe it, what she said?

3 Q I'm just trying to figure out -- just so you  
4 understand where I'm going through this. We're going to  
5 go -- you're going to tell me what about the work  
6 environment was hostile or stressful. And you know, we've  
7 got to go figure out -- if that's really the case, then we  
8 got to go do something about it.

9 You know, sometimes there's two sides to the  
10 story, but I always like to know, you know, if there's  
11 some personal issue that I shouldn't really trust this  
12 person, what she's saying about you because of, you know,  
13 some backstory. And I like to know the backstory because  
14 that helps us understand, you know, should we really put  
15 full stock in what this person's saying.

16 Does that make sense?

17 A Yes, it makes sense. But she's no longer there.

18 Q That's Michelle?

19 A Yes.

20 Q Okay. So what was the issue between her and you?

21 A Just harassment. Talking to me in a way,  
22 professional way as being my lead, like, "You chew gum  
23 like a cow." Just harassing me all the time. "I expect  
24 you to be on the floor at 7:15," but I hold the elevator  
25 for her to come in. Just there was a lot of back and

1     forth.

2           Q     And what was the issue with Siony?

3           A     Yeah.  She would, like, demand me or holler at  
4     me, call me stupid on different occasions.

5           Q     Anybody else?

6           A     No, nobody else.

7           Q     Have you had any other side jobs, other sources  
8     of income while you've worked at Kaiser?

9           A     No.

10           MR. BROWN:  Counsel, can we go off the record?

11           MS. FOLEY:  Yes, sure.

12           (Discussion held off the record.)

13           MR. BROWN:  Let's go back on the record.

14           Off the record we had a brief discussion about  
15     some administrative issues related to the pleadings.

16     BY MR. BROWN:

17           Q     Darlene, so what happened in February that made  
18     your orthopedic injuries come to a head such that you were  
19     taken off work?  Did the pain start getting worse?  Did  
20     the job duties change?  Why February?  I'm just trying to  
21     understand.

22           A     The pain started getting worse.

23           Q     And you felt like you weren't getting appropriate  
24     treatment with Kaiser On the Job?

25           A     Correct.

1 Q What about the treatment did you feel was not  
2 appropriate?

3 A It was just a short therapy, light duty for three  
4 weeks. And then it's, like, release you back to work.

5 Q So I saw something in Dr. Flores's report that  
6 talked about an increased workload.

7 Did your -- you know, the workload change at all  
8 in January and February of 2020?

9 A Yes. Because we have more stroke patients, and  
10 there are heavy patients.

11 Q So in your own mind -- and I'm just asking for  
12 you. I'm not trying to get a medical opinion -- was it  
13 more the orthopedic that made you go off work, or was it  
14 the stress that made you go off work in February of this  
15 year?

16 A Both.

17 Q One more than the other or just equal?

18 A One more.

19 Q And which one was more?

20 A The --

21 Q Sorry. I didn't catch that.

22 A The ortho.

23 Q And the stress you were experiencing at that  
24 time, was that related to the pain you were experiencing  
25 and your difficulty performing the job, or was it related

1 to your coworkers harassing you and/or statements that  
2 other people were saying about you?

3 A The work.

4 Q When you say "the work," do you mean the  
5 increased workload and the impact on you physically or  
6 just the increased workload independent of the physical?

7 A Physically.

8 Q Okay. So the increased physical demands and the  
9 pain you were experiencing is what caused the stress?

10 A Can you repeat that?

11 Q The increased work demands and the pain that  
12 increased at that time is what caused your stress?

13 A Yes.

14 Q So here's the part where I usually ask you about,  
15 like, what sort of stuff do you go out and do for fun, but  
16 with COVID nobody's going out and having any fun.

17 Before COVID what sort of -- you know, outside of  
18 work, what sort of physical activities would you do?

19 A Go dancing. Shoot pool. Gatherings with my  
20 family.

21 MR. BROWN: Counsel, I'm going to start getting  
22 into some psych background questions. Do you want to  
23 follow up on anything related to the injury?

24 MS. FOLEY: No follow-up questions so far.

25 BY MR. BROWN:

1 Q Okay. So we're going to transition into kind of  
2 your psych history. These are kind of intrusive personal  
3 questions, so don't shoot the messenger.

4 A Okay.

5 Q In your own words, can you tell me what problems  
6 you were having at work in February of this year?

7 A I was having employees, managers, watching every  
8 move I make. When I took a break, they had the employees  
9 write the time down. They watched me go down the hallway,  
10 watch me come back.

11 Q Anything else?

12 A Saying to me, because I was on light duty, just  
13 keep your eye on the monitor, because I was doing --  
14 monitoring the cameras.

15 Q Anything else?

16 A No.

17 Q Were you having any emotional problems unrelated  
18 to work in February 2020?

19 A No.

20 Q How about now? Didn't catch that. Sorry.

21 A No.

22 Q Have you ever had surgery for any reason?

23 A Yes.

24 Q More than one?

25 A No.



1 Q What sort of surgeries have you had?

2 A Partial hysterectomy.

3 Q And is that the only time you've been  
4 hospitalized overnight besides childbirth?

5 A Yes.

6 Q When you were growing up, did you have a goal or  
7 ambition you wanted to pursue?

8 A Yes.

9 Q And what was that?

10 A To be a registered nurse.

11 Q And has that goal changed?

12 A Yes.

13 Q And what about it has changed?

14 A I do not want to become a nurse anymore.

15 Q Do you have a different goal or ambition now?

16 A Just to care for kids.

17 Q Any close family members, spouse, child, father,  
18 mother ever been arrested?

19 A Repeat that.

20 Q Any close family members such as a spouse, child,  
21 father, mother, ever been arrested?

22 A Yes.

23 Q Ever been convicted of any felonies?

24 A Yes.

25 Q Who was that?

1 A My son.

2 Q And what was he convicted of?

3 A Gang banging. Just --

4 Q Is he currently in prison?

5 A Yes.

6 Q And when you say "gang banging," is that an armed  
7 assault? murder? armed robbery? What sort of --

8 A Assault, I guess.

9 Q How long is his prison term?

10 A Fourteen years.

11 Q When does he get out?

12 A October.

13 Q Anybody else?

14 A Anybody else?

15 Q Any other close family members been arrested or  
16 convicted of any felonies?

17 A No.

18 Q Have you had any children die?

19 A No.

20 Q Have you ever had cancer?

21 A No.

22 Q Have you ever had heart disease?

23 A No.

24 Q Any sexually transmitted diseases? Sorry. I  
25 didn't hear you.

1 A No.

2 Q Do you go to church?

3 A Yes.

4 Q Would you consider yourself a very religious  
5 person?

6 A Yes.

7 Q Have you ever felt persecuted for your religious  
8 beliefs?

9 A No.

10 Q Do you feel like you get depressed easily?

11 A No.

12 Q Do you have any tendencies towards violent  
13 behavior?

14 A No.

15 Q Are you fearful of being harmed by another  
16 individual?

17 A No.

18 Q Do you feel insecure about any one thing in  
19 particular?

20 A No.

21 Q Do you own any firearms?

22 A No.

23 Q Would you consider your childhood as being a  
24 happy childhood?

25 A Yes.

1 Q Were you ever sexually or physically abused as a  
2 child?

3 A No.

4 Q How about as a teenager?

5 A No.

6 Q As an adult?

7 A No.

8 Q Would you consider yourself as being a loner?

9 A No.

10 Q Do you consider yourself as having a normal  
11 social life?

12 A Yes.

13 Q Do you feel paranoid that people are watching or  
14 following you?

15 A No.

16 Q Some people say yes to that.

17 Do you feel superior to those with whom you work  
18 or with whom you live?

19 A No.

20 Q Do you have extreme claustrophobia?

21 A Not extreme.

22 Q When I say "extreme," like if you had to go up to  
23 the tenth floor, you wouldn't take an elevator because  
24 you're so freaked out about the inside of an elevator?

25 A No. I'm okay. No.

1 Q Same thing with extreme fear of heights?

2 A Can you repeat?

3 Q Do you have an extreme fear of heights?

4 A No.

5 Q Have you ever had an abortion?

6 A Yes.

7 Q Just one or more than one?

8 A More than one.

9 Q When was the most recent one?

10 A Thirty years ago.

11 Q Do you still have psychiatric issues as a  
12 consequence of that?

13 A Can you repeat?

14 Q Do you still have psychiatric issues as a  
15 consequence of that?

16 A No.

17 Q Have you ever been robbed at any point in your  
18 life?

19 A Attempt.

20 Q Is that when you were a witness?

21 A Yes.

22 Q Have you ever robbed anybody?

23 A No.

24 Q Have you ever been assaulted by anybody besides  
25 that robbery attempt?

1 A No.

2 Q Would you consider yourself as being a jealous  
3 person?

4 A Repeat that.

5 Q Do you consider yourself to be a jealous person?

6 A A sweet person?

7 Q Jealous.

8 A Oh. No.

9 Q Do you ever hear voices telling you what to do or  
10 say?

11 A No.

12 Q Have you ever felt suicidal?

13 A No.

14 Q Any close family members, spouse, children,  
15 parents, brothers, sisters have a history of mental  
16 illness?

17 A No.

18 Q Have you ever used illegal street drugs?

19 A No.

20 Q Never?

21 A No.

22 Q Have you ever consumed alcohol?

23 A Yes.

24 Q How often do you drink alcohol?

25 A Probably three times a week now.

1 Q Glass of wine with dinner?

2 A Yes. Or a cold beer.

3 Q Have you ever had an eating disorder like bulimia  
4 or anorexia?

5 A No.

6 Q Do you have problems controlling your temper?

7 A No.

8 MR. BROWN: I don't have any further questions.

9 MS. FOLEY: I don't have any follow-up questions.

10 MR. BROWN: I'm going to reserve my right for a  
11 Volume II if something comes up in the psych records that  
12 wasn't discussed or, I guess, if the pleadings get amended  
13 to include a body part not covered or not currently pled.

14 But I'm going to propose stipulations, if that's  
15 okay with you, Lori. I'm going to propose that the court  
16 reporter be relieved of her official duties under the  
17 California Code of Civil Procedure specifically as it  
18 relates to custody of the original transcript. At the  
19 time of trial or any other WCAB appearance a deposition  
20 transcript is necessary, a certified copy may be used  
21 instead of the original. Forty-five days for signature.

22 Any further stipulations, Counsel?

23 MS. FOLEY: No. So stipulated.

24 (End of deposition.)

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ERRATA SHEET

CORRECTIONS :

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I, DARLENE WALLS, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as they appear on the errata sheet, which is signed by me; that my corrected testimony as contained herein is true and correct.

EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_\_\_, at \_\_\_\_\_, \_\_\_\_\_.  
(City) (State)

\_\_\_\_\_  
DARLENE WALLS

1 I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken before  
4 me at the time and place herein set forth; that any  
5 witnesses in the foregoing proceedings, prior to  
6 testifying, were duly sworn; that a record of the  
7 proceedings was made by me using machine shorthand which  
8 was thereafter transcribed under my direction; that the  
9 foregoing transcript is a true record of the testimony  
10 given.

11 Further, that if the foregoing pertains to the  
12 original transcript of a deposition in a Federal Case,  
13 before completion of the proceedings, review of the  
14 transcript [ ] was [ ] was not required.

15 I further certify I am neither financially  
16 interested in the action, nor a relative or employee of  
17 any attorney or party to this action.

18 IN WITNESS WHEREOF, I have this date subscribed  
19 my name.

20  
21 Dated: 8/17/2020

22  
23 Lori M. Brown  
LORI M. BROWN  
CSR No. 12614

24  
25 Dismantling of transcript will void Reporter's  
certificate.

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