

BEFORE THE WORKERS' COMPENSATION APPEALS BOARD

STATE OF CALIFORNIA

REGELIN CASTILLO,	)	WCAB No.:	ADJ14349578
	)		ADJ14349577
Applicant,	)		
	)		
v.	)		
	)		
ADVENTIST HEALTH WHITE MEMORIAL;	)		
PERMISSIBLY SELF-INSURED	)		
ADMINISTERED BY SEDGWICK CLAIMS	)		
MANAGEMENT,	)		
	)		
Defendant(s).	)		
_____	)		

REGELIN CASTILLO

TAKEN ON THURSDAY, OCTOBER 7, 2021

Reported By: Kristiaan Ruiz  
CSR No. 13984



DEPOSITION OF REGELIN CASTILLO

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DEPOSITION OF REGELIN CASTILLO, taken before  
 Kristiaan Ruiz, a Certified Shorthand Reporter for the  
 State of California, with principal office in the  
 County of Los Angeles, commencing at 10:02 a.m.,  
 Thursday, October 7, 2021, taking place remotely.



1 APPEARANCES OF COUNSEL:

2

3 FOR THE APPLICANT:

4 WORKERS DEFENDERS LAW GROUP  
5 BY: NATALIA FOLEY  
6 ATTORNEY AT LAW  
7 751 S. Weir Canyon Road  
8 Suite 157-455  
9 Anaheim, California 92808

10 FOR THE DEFENDANT:

11 ALBERT AND MACKENZIE  
12 BY: MICHELLE PARKINGTON  
13 ATTORNEY AT LAW  
14 1855 West Katella Avenue  
15 Suite 330  
16 Orange, California 92867  
17 714-289-4459

18 ALSO PRESENT:

19 Amanda Coombe

20 Erica Arellano

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DEPOSITION OF REGELIN CASTILLO

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I N D E X

EXAMINATION BY:	PAGE
Ms. Parkington	5

EXHIBITS

(None.)

UNANSWERED QUESTIONS

(None.)

INFORMATION REQUESTED

(None.)



DEPOSITION OF REGELIN CASTILLO

1 Thursday, October 7, 2021, 10:02 a.m.

2 Los Angeles, California

3

4 REGELIN CASTILLO,

5 called as a witness on behalf of the Defendant, having been  
6 first duly sworn, was examined and testified as follows:

7 THE WITNESS: I do.

8

9

EXAMINATION

10 BY MS. PARKINGTON:

11 Q Ms. Castillo, my name is Michelle Parkington, I'm an  
12 attorney, and my firm has been retained to represent the  
13 interest of the insurance company in connection with your  
14 workers' compensation claim. This proceeding is basically an  
15 informal question and answer session. I'll be asking  
16 questions and you will answer those questions to the best of  
17 your knowledge and ability. Neither myself, nor your  
18 attorney, want you to guess at any answer here today, but I  
19 am entitled to your best estimate.

20 The difference between an estimate and a guess is that,  
21 if I were to ask you to guess as to the length of the desk in  
22 my office, you wouldn't be able to because you've never seen  
23 it before, but if I were to ask you to estimate the length of  
24 a table sitting in front of you, you'd be able because you  
25 can see it. Do you understand the difference between an



1 estimate and a guess?

2 A Yes.

3 Q Now, we are in an informal surroundings here today,  
4 but the testimony that you're going to give is the same as if  
5 you were testifying in a court of law; that means the penalty  
6 of perjury applies. In the State of California, it can bring  
7 criminal charges against you if it finds that you lied here  
8 today. Now the court reporter is trying to take down  
9 everything that's being said, so it's very important,  
10 especially since we are on Zoom, to speak loud enough, and  
11 clear enough, for everyone to understand.

12 It's also very important to not speak at the same time  
13 as anyone else because the court reporter won't be able to  
14 hear anything at all. Please wait for a question to be fully  
15 asked, or for someone to finish speaking, before responding.  
16 Please also avoid any nonverbal responses or gestures, such  
17 as nodding or shaking your head or uh-huh. Please answer in  
18 the affirmative or the negative by using either yes or no,  
19 and please also avoid gesturing to body parts. Be as  
20 descriptive as possible so the court reporter can get an  
21 accurate transcript.

22 Now, if you don't understand one of my questions, I'd be  
23 happy to rephrase it for you. If you don't hear one of my  
24 questions, I'd be happy to repeat it, but if you do answer  
25 one of my questions, I'm going to assume that you both heard



1 and understood it; is that fair?

2 A Yes. Thank you.

3 Q In about two weeks, the court reporter will have had  
4 the opportunity to transcribe her notes into a booklet. You  
5 will be given a copy of that booklet and can make any changes  
6 or corrections that you'd like. If you do make any changes  
7 or corrections, I can comment on those at the time of trial,  
8 and if you testify differently here today than you do at the  
9 time of trial, I can comment on that as well. If, at any  
10 point, you need to take a break, please let us know. Do you  
11 have any questions about anything so far?

12 A I'm good. Thank you.

13 Q Okay. Have you had any drugs, alcohol, or  
14 medication in the twelve hours preceding this deposition?

15 A No.

16 Q Okay. Would you please state your full name?

17 A Regelin Pimentel Castillo.

18 Q Do you have a driver's license or photo  
19 identification card with you?

20 A Yes, I do, but I have to go get it quickly. I'm  
21 sorry.

22 Q That's okay. We can give you a second to do that.  
23 We can go off the record for a moment. Would you please hold  
24 it up to the camera, and, Counsel, I will not read the  
25 numbers into the record.



DEPOSITION OF REGELIN CASTILLO

1           A       I'm showing you my driver's license.

2           Q       Yes, thank you.  It's because you have a blurry  
3       thing on.  I'm only picking up your face.

4           A       No problem.  Let me take it off real quick.  I'm in  
5       my bedroom, that's why.

6           Q       That's what we're all dealing with, I get it.  Thank  
7       you.  Okay.  Have you ever used or gone by any other name?

8           A       No.

9           Q       What is your current home address?

10          A       27003 Mountain Willow Lane, Santa Clarita,  
11       California 91387.

12          Q       Do you live with anyone at that address?

13          A       Yes.

14          Q       Who?

15          A       My husband and my older daughter.

16          Q       How long have you lived there?

17          A       Eleven years.

18          Q       Do you own or rent?

19          A       Own.

20          Q       Do you have a mortgage?

21          A       Yes.

22          Q       How much is it per month?

23          A       Estimate three thousand.

24          Q       What is your date of birth?

25          A       7/23/1965.





1 Q Where were you born?

2 A Manila, Philippines.

3 Q What is your social security number?

4 A 550 --

5 MS. PARKINGTON: Hold on one sec. Natalia, you're muted.

6 MS. FOLEY: We do that off record, please.

7 MS. PARKINGTON: That's fine. We can go off the record,  
8 please.

9 (Off the record.)

10 MS. PARKINGTON: Okay, back on.

11 Q What's the highest level of education that you've  
12 completed?

13 A College.

14 Q Where was that done?

15 A Loma Linda University La Sierra Campus in Riverside,  
16 California.

17 Q And what year did you complete that?

18 A 1985.

19 Q What year did you come to the United States?

20 A 1981.

21 Q What is your husband's name?

22 A Abel Castillo.

23 Q Does he work?

24 A Yes.

25 Q Where?



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1 A Government worker.

2 Q How long have you been married?

3 A Thirty-six -- thirty-four years, sorry.

4 Q And how many children do you have?

5 A Two.

6 Q What are their ages?

7 A Thirty-two and twenty-nine.

8 Q Which one lives with you?

9 A The oldest.

10 Q Have you ever served in the military?

11 A No.

12 Q Do you own a car?

13 A Yes.

14 Q What kind?

15 A A Honda.

16 Q What model?

17 A Odyssey.

18 Q Do you make any payments on it?

19 A It's paid.

20 Q What year is it?

21 A I don't remember. My husband is the one that --

22 Q Okay. What is your current source of income, if  
23 any?

24 A I do not work at the moment.

25 Q Do you have any -- strike that. Are you getting any



1 benefit from the insurance company or from the state?

2 A Clarify your question. What do you mean by  
3 insurance company?

4 Q I'm asking for any sources of income. So it could  
5 be the workers' compensation insurance company, it can be any  
6 other insurance company.

7 A It's the workers' comp company.

8 Q In relation to the workers' compensation claims  
9 against Adventist Health?

10 A Yes.

11 Q How much are you receiving, do you recall?

12 A Yes, seventeen hundred.

13 Q Do you have any other sources of income coming in  
14 from any other insurance company or government agency?

15 A No.

16 Q Have you ever been convicted of a felony?

17 A No.

18 Q Have you ever filed a previous workers' compensation  
19 claim?

20 A Currently, for the current one, yes.

21 Q Have you -- other than the ones that are currently  
22 pending against Adventist Health, have you ever had filed a  
23 previous workers' compensation claim?

24 A No.

25 Q Have you ever been involved in a lawsuit?



DEPOSITION OF REGELIN CASTILLO

1 A No.

2 Q Have you ever had your deposition taken before?

3 A No.

4 Q When did you start working for Adventist Health?

5 A With White Memorial it was September 1988.

6 Q Are you still working there?

7 A No, I'm not.

8 Q When's the last day that you worked?

9 A February 19, 2019.

10 Q And why did you stop?

11 A Because of all the pain that I'm having in my body,  
12 and stress.

13 Q I'm sorry, I missed that last part.

14 A And stress.

15 Q When you stopped working in February of 2019, did  
16 you have a doctor's note at that time to go off of work?

17 A No.

18 Q Have you worked anywhere at all since February 19,  
19 2019?

20 A No.

21 Q Okay. While you were working at White Memorial, how  
22 many hours a week, on average, did you work?

23 A Eight to ten a day, so around forty to forty-five  
24 sometimes, or fifty hours a week.

25 Q Were you paid salary or hourly?



1 A Hourly.

2 Q What was your hourly rate when you stopped  
3 working?

4 A \$32.33.

5 Q Did you get paid overtime?

6 A When it's approved, yes.

7 Q What was your supervisor's name?

8 A The last one was Paola -- I forgot her last name.

9 Q How long was she your supervisor for?

10 A About three years.

11 Q Anyone else that you regularly reported to?

12 A No one else.

13 Q Did you get along with her?

14 A Not really.

15 Q Why not?

16 A She was a difficult boss, but we get along in  
17 general.

18 Q What do you feel made her difficult?

19 A Very abrupt.

20 Q Was she always like that?

21 A Yes.

22 Q Was she like that with everyone?

23 A Yes.

24 Q Did you supervise anyone?

25 A No.



1 Q Did you get along with your coworkers?

2 A Yes.

3 Q Did you ever receive any written or oral reprimands  
4 or write-ups that you recall?

5 A Yes.

6 Q When or what were the situations that you can  
7 remember?

8 A I don't remember when.

9 Q What was it for or they for?

10 A Just to be blunt, petty.

11 Q Who was being petty? You were being petty or they  
12 were being petty?

13 A The supervisor.

14 Q So was that -- sorry, I forgot your supervisor's  
15 name. That was your supervisor you're talking about who  
16 wrote you up?

17 A Yes.

18 Q Okay. What did she say that you did, or why she was  
19 writing you up?

20 A She just doesn't like everything at any time; she  
21 changes her rules all the time; she changes her opinion on  
22 things all the time.

23 Q Can you give me an example, like, what kind of  
24 things was she changing her rules about that you got in  
25 trouble for?



1           A       Just the way she doesn't like the margins are in my  
2       report, or the way a phrase is written in my report, she just  
3       likes it differently each time she chooses to.

4           Q       What was your job title?

5           A       I was a medical staff coordinator.

6           Q       Did you have that position the entire time that you  
7       were at White Memorial?

8           A       Twenty-five years.

9           Q       And what did you do in that position?

10          A       It's a eight-hour job, attending meetings,  
11       coordinating that has to do with those meetings, meeting with  
12       my physician chairman and members of the committee, liaison  
13       for the physician administration and the administration of  
14       the hospital, and involves creating reports, and also giving  
15       reports, and also liaison from the physician administration  
16       to the nursing management or administration management  
17       levels.

18          Q       Okay. So was a lot of your job at a computer or  
19       writing?

20          A       Yes. It started with writing, and then, with the  
21       implementation of using laptops, I started doing that in the  
22       last ten years of my working there.

23          Q       Did you sit for most of your shift?

24          A       Ninety-five percent of the time.

25          Q       While you were working for White Memorial, were you



1 employed anywhere else?

2 A No.

3 Q Okay. You understand that you have two separate  
4 claims filed?

5 A Yes.

6 Q Okay. One is for specific injury; is that  
7 correct?

8 A Correct.

9 Q And what is that date of injury?

10 A For the --

11 Q For the specific injury?

12 A The right knee is 9/17/2018, and for the cumulative  
13 trauma, which was claimed in 2021.

14 Q And you understand the nature of a cumulative trauma  
15 claim, like, what that means versus a specific injury?

16 A Yes.

17 Q Okay. So starting with the 9/17/18 injury, what  
18 happened?

19 A I was stepping out of my building, and I tripped  
20 over a door mat that was covering an uneven surface, and I  
21 fell both on my knees.

22 Q And what parts of your body were involved? What did  
23 you injure in that fall?

24 A Both my knees, more on my right knee, and also my --  
25 both my wrists, my hands.





1 Q Anything else for that injury alone?

2 A Yes. When I fell and I landed more on my right  
3 knee, so that also affected my right hip.

4 Q Were there any witnesses?

5 A Yes.

6 Q Who?

7 A I don't remember their names.

8 Q And -- I'm sorry about that. Continue.

9 A That's okay. They just happened to be right there  
10 because it's a busy area; it's a walking area.

11 Q Did you report the injury to your employer?

12 A Yes.

13 Q When?

14 A I was told to go to HR the next day.

15 Q And did you?

16 A Yes. I reported to the plant director, plant  
17 services director, that -- after my injury on that day.

18 Q And when you reported it, did they offer medical  
19 treatment?

20 A HR sent me directly to the industrial clinic.

21 Q Did they just have one on site there?

22 A Yes.

23 Q Did you miss any time from work immediately after  
24 that injury?

25 A No.



1 Q Okay. Now let's talk about the cumulative trauma  
2 claim. Just to reiterate the nature of a cumulative trauma  
3 claim, is that they are injuries that occur over a period of  
4 time rather than on one specific date. So what body parts  
5 have you injured as a result of cumulative trauma?

6 A For one is my left shoulder, the other one is my  
7 right knee, and my elbows, my lower back.

8 Q Anything else?

9 A And the compensation that I have been -- have had my  
10 right shoulder is also affected.

11 Q Okay. Any other body parts or conditions?

12 A My whole back in general, including my upper back.

13 Q Any other body parts or condition?

14 A I think -- I think that's it.

15 Q Okay. Did you report anything related to the  
16 cumulative trauma with your -- strike that -- to your  
17 employer?

18 A Yes.

19 Q When?

20 A At the time of my pain started.

21 Q When was that?

22 A For the left shoulder it was in 1993, when I started  
23 feeling more and more pain, and, as you know, my right knee  
24 was September 17, 2018, and as a result of the pain that I  
25 been having in my shoulders, it affected my whole back, lower



1 and upper back, including my elbows, and actually my hands,  
2 my fingers.

3 Q You suffered a shoulder injury back on June 6, 1993;  
4 correct?

5 A Correct.

6 Q What shoulder or was it both?

7 A When I reported my injury, they were both shoulders,  
8 but my left was -- suffered more of the pain, from the  
9 injury.

10 Q Did you have surgery on either shoulder after that  
11 injury?

12 A No.

13 Q And did you have a settlement for that injury?

14 A I don't remember. Yeah, I don't remember.

15 Q Okay. I know it was a long time ago. It looks like  
16 you had a settlement in 2000, with future medical care for  
17 your left shoulder awarded; does that sound familiar?

18 A That is correct. That is correct.

19 Q And did you continue to treat for your left shoulder  
20 over the year?

21 A Yes.

22 Q And did you treat with Adventist that whole time for  
23 that future medical care?

24 A Yes.

25 Q Okay. So I believe you said that you went right to



1 the industrial clinic at White Memorial, excuse me, right  
2 after the September 2018 injury, right?

3 A That's correct.

4 Q Okay. And have you been treating at that same  
5 facility since then?

6 A Yes.

7 Q Okay. Have you treated for any of your injuries  
8 outside of Adventist health system?

9 A No.

10 Q What about chiropractor Eric Gofnung, is he with  
11 Adventist as well?

12 A No, he's not.

13 Q He's outside of it?

14 A Yes.

15 Q Okay. And are you currently treating with him?

16 A I was sent to him to be evaluated.

17 Q So was it a one time thing then?

18 A Yes, it's with this claim.

19 Q Okay. So you only saw him -- I have it's May 28,  
20 2021, so was that the only time that you saw him?

21 A It was just for evaluation.

22 Q So where are you currently treating?

23 A I currently see Dr. John Itamura at Kerlan-Jobe,  
24 which is affiliated with White Memorial, as well as  
25 Dr. Nasser Mizban, who is my work comp primary, and Phillip



1 Merritt, also at Adventist Health, at Glendale Adventist.

2 Q What kind of treatment are you currently  
3 receiving?

4 A Dr. John Itamura for my shoulder. I follow up with  
5 him for pain management, and Dr. Phillip Merritt I follow up  
6 with him for post surgery and check up on my right knee.

7 Q With Dr. Itamura what shoulder?

8 A Left shoulder.

9 Q So are your left shoulder and right knee the only  
10 body parts that you're treating for, or are you still  
11 treating for any other body part?

12 A Currently, those are the two.

13 Q Are you still treating with Dr. Mizban or are you  
14 treating -- did you transfer over to Dr. Merritt from  
15 Dr. Mizban?

16 A Dr. Mizban is my primary work comp physician, so  
17 he -- I report to him every six weeks, and I report to him  
18 when I've seen -- whenever I see Dr. Itamura and Merritt.

19 Q When was your surgery?

20 A For my right knee, it was June 2020.

21 Q Okay. So what kind of treatment specifically are  
22 you doing right now? Like, physical therapy, or is it just  
23 medication with pain management, or are you just following up  
24 with the doctors? What kind of treatment plan are you  
25 currently on?



1           A       Post surgery I was treated with -- I was sent for  
2       physical therapy, and I completed those, and Dr. Merritt told  
3       me to, as well as the other doctors, the other two doctors,  
4       they recommended that I start strengthening exercises. I've  
5       been doing that since the beginning of this year. Prior to  
6       that, I've been to physical therapies, both ordered by  
7       Dr. Itamura and Dr. Merritt, as well as Dr. Mizban.

8           Q       Okay. So for your left shoulder, you said you first  
9       started -- strike that. Did you first start having issues  
10      with your left shoulder in 1993 when you had that specific  
11      injury?

12          A       I've had issues prior to that, but that was the date  
13      that I reported it to HR.

14          Q       Okay. So when did your left shoulder problem  
15      start?

16          A       It started about a year after I was employed, and  
17      with all the duties that I had been doing, it was on and off,  
18      and then it became more and more a problem.

19          Q       Have you ever had surgery to your left shoulder?

20          A       No.

21          Q       Has it ever been recommended, to your knowledge?

22          A       It was discussed as an alternate treatment, but  
23      never given as a positive treatment for that time being.

24          Q       How often do you have pain in your left shoulder?

25          A       Almost all the time.



1 Q So daily?

2 A Yes.

3 Q On a scale of one to ten, with one being almost no  
4 pain at all and ten being excruciating pain where you would  
5 have to go to the emergency room because you would not be  
6 able to function, what level would you say the average level  
7 of pain in your left shoulder is?

8 A About a seven.

9 Q Does it ever get worse than that?

10 A Yes, and that's the time I would have my pain  
11 medication, my pain shot.

12 Q When it gets worse, what level does it reach?

13 A I would say eight, nine.

14 Q And what kind of movements or activities aggravate  
15 it or cause it to be worse, if there's anything you can  
16 pinpoint?

17 A Anything above my shoulders, pushing, pushing up or  
18 pulling down from above my shoulders, repetitive motions,  
19 sleeping on my left side, driving, typing, filing, and I'm  
20 saying this is when I used to be working, and even now, with  
21 what I have to do on a daily basis, it aggravates my  
22 shoulder.

23 Q What kind of things do you do now that aggravate  
24 it?

25 A Driving, doing house work, groceries, lifting



1 heavier than fifteen pounds.

2 Q And what, if anything, alleviates that pain or help  
3 lower it?

4 A I take pain medication.

5 Q How often?

6 A At some point, where I can still manage it, then I  
7 take at least three doses of Advil during the day.

8 Q So do you -- then do you take Advil on a daily basis  
9 or it's as needed so it might be less often?

10 A It's more as needed.

11 Q Okay. So is it daily or a couple times a week?

12 A At least a couple times a week.

13 Q And is that over-the-counter Advil or is it a  
14 prescription?

15 A Right now it's over-the-counter Advil. I was taking  
16 some prescription medications.

17 Q But not anymore?

18 A Because it was making my blood pressure go up.

19 Q And the Advil doesn't cause that spike in your blood  
20 pressure?

21 A No.

22 Q Okay. Do you know when you are not taking those --  
23 strike that. So is your blood pressure what would be  
24 considered normal then so long as you're not taking that  
25 medication?





1           A       It's in the norm range when I don't take the  
2       prescription medication.

3           Q       And since you stopped working, has your shoulder  
4       pain gotten better, worse, or stayed the same?

5           A       It stayed the same.

6           Q       And prior to your employment with Adventist Health,  
7       did you ever have any shoulder injury or any problems with  
8       your shoulder?

9           A       No.

10          Q       Okay. Now for your right knee, when did you first  
11       start noticing pain in your right knee?

12          A       Immediately that evening, after the injury.

13          Q       After the September 2018 date of injury?

14          A       That day, September 17, I started having pain that  
15       evening.

16          Q       And has your -- strike that. Have your symptoms  
17       improved since your surgery?

18          A       It's somewhat improved, but I still have swelling,  
19       stiffness, clicking of my joint.

20          Q       And using the same scale of one to ten that I  
21       described before, what number would you give to the average  
22       level of pain that you have in your right knee?

23          A       Six.

24          Q       And does it get any worse than that?

25          A       Yes.



1 Q If it gets worse, what level does it get to?

2 A Seven.

3 Q And is there any sort of movement or activity you  
4 notice that aggravates the knee pain?

5 A Yes, walking.

6 Q How far would you say you have to walk for it to be  
7 aggravated?

8 A Half to a mile.

9 Q And how often do you have knee pain?

10 A Whenever I do the walking, or stooping down,  
11 squatting, standing for a period of time, driving, it's my  
12 driving leg.

13 Q And is there anything that alleviates the pain or  
14 makes it better, any treatment or medication?

15 A I just take Advil if I have to. I've been doing  
16 some strengthening of my muscles, that's been helping.

17 Q Okay. And prior to the 9/17/18 injury, did you ever  
18 have any prior injuries to your right knee?

19 A No.

20 Q Did you ever have any pain or problems with your  
21 right knee prior to that date?

22 A No.

23 Q Okay. And you -- sorry. You also mentioned your  
24 left knee; is that correct?

25 A No.



1 Q Okay. And your wrists, are you still having  
2 problems with one or both of your wrists?

3 A Once in a while, when my elbows get stiff and my  
4 fingers get stiff.

5 Q Okay. So I'm not asking for your medical opinion,  
6 but does it feel like your problem is more in your elbow than  
7 in your actual wrist or does it feel separate?

8 A It's triggered. The pain is triggered in my elbow,  
9 my wrist, my hands, when my shoulder is in pain.

10 Q Okay. So outside of having pain in your shoulder,  
11 are there any, I guess, independent symptoms or problems that  
12 you feel like you have in your elbows, wrists and fingers, or  
13 does it feel like it's all tied together?

14 A They're all tied together.

15 Q Okay. And when you do have that pain, on that same  
16 scale of one to ten, what level would you say it's at?

17 A I would say it's between a four and a five.

18 Q And how often does that happen?

19 A It happens automatically, almost instantly, when my  
20 shoulder is inflamed.

21 Q Would you say it's daily?

22 A I would say it's about daily, yeah.

23 Q Is it worse on one side or the other?

24 A They're both the same.

25 Q When did you first notice the problems with your



1 elbow, wrist, finger?

2 A I've noticed it even before I reported my injury of  
3 the left shoulder in 1993.

4 Q Prior to your employment with Adventist Health?

5 A No. I'm sorry, I thought you were gonna say some  
6 more.

7 Q Sorry. And prior to your employment, did you ever  
8 have any injuries or problems with your elbows, shoulders,  
9 hand -- sorry, strike that -- elbows, hands, wrists?

10 A No.

11 Q And has that pain gotten better, worse, or stayed  
12 the same since you stopped working?

13 A It stayed the same.

14 Q And do -- like, when you take Advil, does that  
15 help?

16 A It helps.

17 Q Okay. Did you also mention your right shoulder or  
18 is it just your left shoulder?

19 A At the time of my report, it was both shoulders, but  
20 since the left shoulder has more symptoms, they treated me  
21 more on my left than my right.

22 Q Okay.

23 A Going forward.

24 Q I'm sorry, hold on. I need to go off for like ten  
25 seconds.



1           A     Okay.

2           Q     Okay.  So talking about your right shoulder, you  
3     said that it -- that began at the same time as your left  
4     shoulder; is that correct?

5           A     Both my shoulders at the time of my report, yes.

6           Q     And you're talking back in 1993?

7           A     That's correct.

8           Q     Okay.

9           A     May I add a few things?

10          Q     Of course.

11          A     Just going back to your question about, you know,  
12     any conditions that I felt at the time of my working and my  
13     start of work, I was also -- because of the use of computers,  
14     I also started to have headaches, and the eye exam that I  
15     had, I had to wear prescription glasses, but when I'm close  
16     to a computer, I don't need it.  It's astigmatism is what I  
17     developed.

18          Q     When did -- or when were you first diagnosed with  
19     astigmatism?

20          A     It was in -- it was after 1993 that I started to  
21     wear -- I don't know exactly the date.

22          Q     So do you use glasses, wear glasses at all?

23          A     Because of the astigmatism, I don't need it when I'm  
24     very close to the screen; however, HR was able to provide me  
25     a non-glare screen protection, which I use on my desktop and



1 a laptop.

2 Q Does that help with your eyes and with headache?

3 A Yes, it helped me, but I continue to wear my  
4 prescription glasses for farsight distance, for far  
5 distance.

6 Q How long have you been -- I'm sorry.

7 A I have to use my bifocals.

8 Q A lot of people have to use bifocals, so. So when  
9 did you first start wearing glasses? Was it in the  
10 nineties?

11 A In the nineties.

12 Q Okay. So going back to your right shoulder, if  
13 that's okay, I don't know if there's anything else you want  
14 to add.

15 A I'm good.

16 Q Okay. So has your left shoulder been worse than  
17 your right shoulder overall?

18 A Correct.

19 Q Okay. So on the same scale of one to ten, what's  
20 the average level of pain in your right shoulder?

21 A About a four.

22 Q Are you right or left-handed?

23 A I'm right-handed.

24 Q And does the pain ever get worse than four out of  
25 ten?



1 A For my right shoulder?

2 Q Yeah.

3 A Yes.

4 Q What kind of movements or activities make it  
5 worse?

6 A Same; typing, filing, working with credential --  
7 physician credential files, as well as patient medical  
8 records, answering the phones, typing.

9 Q Has that gotten better or worse since you stopped  
10 working?

11 A Not really. When my left shoulder inflames, it's an  
12 electrical connection. Both my right and left shoulder will  
13 start hurting, years of compensation.

14 Q And have you ever had any -- prior to your  
15 employment with White Memorial, any injuries or problems with  
16 your right shoulder?

17 A No.

18 Q Okay. And I believe the last thing you mentioned  
19 was your back; is that correct?

20 A Yes.

21 Q What part of your back?

22 A My, in general, pretty much my whole back.

23 Q Is it worse in one part of your back or are your  
24 feelings pretty consistent?

25 A Well, with all the sitting down ninety-five percent



1 of the time, my lower back suffers from all that sitting  
2 down, and ninety-five percent of the time, when I'm working  
3 at the computer and files, both my shoulders and upper  
4 back.

5 Q When did you first notice pain in your back?

6 A It was the first time when I reported in 1993.

7 MS. FOLEY: Counsel, I apologize, can I take a short  
8 break, just for a break for five minutes?

9 MS. PARKINGTON: No problem. Yeah, we'll all take a  
10 break, come back in five minutes.

11 (Off the record.)

12 BY MS. PARKINGTON:

13 Q Back on the record. We were talking about your  
14 back, and you first started noticing pain in your back at the  
15 same time as your shoulders back in 1993; is that correct?

16 A Yes.

17 Q Okay. So on the same scale of one to ten that we  
18 talked about, what's the average level of pain in your  
19 back?

20 A Seven.

21 Q And is that consistent in your upper and lower back  
22 or do they differ?

23 A It differs. My upper back would be eight.

24 Q And is there anything that helps alleviate that  
25 pain?





1 A Yes.

2 Q What is that?

3 A Massage, Advil. I was given muscle relaxants, and  
4 pain medication, such as injection, cortisone shot to be  
5 specific.

6 Q Who did that?

7 A My orthopedist at the time, Alexander -- Charles  
8 Alexander, which continued with other orthopedists after he  
9 left White Memorial.

10 Q When was that? The time of the injections, I mean.

11 A It started when I -- after I reported my injury in  
12 1993.

13 Q Okay. So have you been treating on and off for your  
14 back since about 1993 then?

15 A Yes.

16 Q Has your back pain gotten better, worse, or stayed  
17 the same since you stopped working?

18 A Stayed the same.

19 Q Have you ever had any injuries or problems with your  
20 back outside of your employment?

21 A No.

22 Q Have you ever been involved in a car accident?

23 A Yes.

24 Q When?

25 A 2015 and 2017.



1 Q Did you suffer any injuries in either of those  
2 accidents?

3 A I suffered back pain, my spine specifically.

4 Q After both accidents?

5 A Correct.

6 Q Do you feel like your back pain was worse after you  
7 were in those car accidents?

8 A No.

9 Q Did you get medical treatment after this accident?

10 A I'm sorry, you cut out. Can you repeat your  
11 question?

12 Q Can you guys hear me okay?

13 A I can hear you.

14 Q Sorry, I think my internet was glitching out. Did  
15 you receive medical treatment after either of those car  
16 accidents?

17 A Yes, I did.

18 Q Okay. All at White Memorial?

19 A Yes.

20 Q Or through the system?

21 A Correct.

22 Q Okay. Have you ever been hospitalized for any  
23 injury or illness?

24 A For illness, yes.

25 Q What was that?



1           A       First off, my two cesarean sections delivery in  
2       eighty-nine and 1992, and then I had my hysterectomy in 2012,  
3       and then I had my right knee surgery in 2020.

4           Q       Any complications after any of those surgeries?

5           A       No.

6           Q       Okay.

7           A       Well, with my right knee I did, I should say that.  
8       Not from the surgery, but as continuing problems that I'm  
9       still having.

10          Q       Right. I just mean, like, with the hospitalization  
11       and any problems with the surgery itself, just if anything  
12       weird happened in the hospital. Any injuries to any body  
13       part such as, like, a trip and fall at home, or playing a  
14       sport?

15          A       No.

16          Q       Okay. Have you ever broken a bone?

17          A       No.

18          Q       Do you have -- have you been diagnosed with high  
19       blood pressure?

20          A       That's correct, yes.

21          Q       When were you first diagnosed with high blood  
22       pressure?

23          A       It was -- I don't exactly remember the date, but  
24       when I started feeling sick, my blood pressure was high  
25       during my employment. I don't remember the date.



1 Q Has it been more than a couple of years?

2 A Yes, more than.

3 Q And do you take any medication right now for your  
4 blood pressure?

5 A Yes, I do.

6 Q What do you take?

7 A Losartan.

8 Q Daily?

9 A Yes.

10 Q And do you take regular blood pressure level?

11 A Yes, I do.

12 Q And would you say right now that your blood pressure  
13 is well controlled?

14 A My diastolic is still high; it's still in between  
15 mid eighties to nineties.

16 Q Has your doctor said anything that, you know, to  
17 help keep that under control, is there anything other than  
18 your medication that you're directed to do or not to do?

19 A Stay away from salty foods, up my dosage from twenty  
20 to fifty milligrams a day.

21 Q Other than the high blood pressure, any other  
22 chronic health condition, chronic meaning long term as  
23 opposed to acute, which is just something like the flu, high  
24 blood pressure is a common example, diabetes is another  
25 common example; any other chronic health conditions?



1 A No, I do not have chronic.

2 Q Okay. Do you smoke?

3 A No.

4 Q Have you ever smoked?

5 A No.

6 Q And I just wanted to clarify, did you resign your  
7 employment at Adventist Health?

8 A Yes, I resigned.

9 MS. PARKINGTON: I don't think I have anything else at  
10 this time. Counsel, do you have anything, Natalia?

11 MS. FOLEY: No, I don't have any questions.

12 MS. PARKINGTON: Okay. Then can we stipulate to relieve  
13 the court reporter of her duties associated with the  
14 transcript under the Code of Civil Procedure; that the  
15 original and one copy will be transmitted to your office  
16 where you'll make arrangements for Ms. Castillo to make any  
17 changes or corrections, and advise my office within  
18 forty-five days of its receipt; and if the original is lost  
19 or destroyed, a certified copy may be used in lieu thereof.

20 MS. FOLEY: So stipulated.

21 (Deposition concluded at 11:24 a.m.)

22

23

24

25



DEPOSITION OF REGELIN CASTILLO

State of California )

County of Los Angeles )

I certify or declare under declaration of penalty of perjury under the laws of the State of California that the foregoing testimony is true and correct, subject to any changes or corrections I have made herein or attached hereto.

Executed in the state of California,

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WITNESS

DEPOSITION OF REGELIN CASTILLO

State of California )  
County of Los Angeles )

CERTIFICATE OF INTERPRETER or PERSON  
READING DEPOSITION TO WITNESS

I, the undersigned reader/interpreter, do solemnly declare under penalty of perjury under the laws of the State of California that I have truly and correctly read; the foregoing transcript to the witness, translating the English language into his/her native tongue (as indicated in the foregoing transcript) to the best of my ability;

That all corrections and changes indicated by the witness have been incorporated herein and initialed by the witness;

That upon completion of said reading, the witness did confirm to me that he/she had understood the reading.

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INTERPRETER

DEPOSITION OF REGELIN CASTILLO

State of California )  
County of Los Angeles )

The undersigned Certified Shorthand Reporter CSR 13984, a court reporter in and for the State of California, does hereby certify:

That any witness(s) named in the foregoing proceeding was(were), before and/or during the commencement of proceeding, duly sworn or affirmed to testify the truth, the whole truth, and nothing but the truth;

That said proceeding was stenographically (or otherwise) reported by me and thereafter transcribed into typewriting under my direction.

The undersigned Certified Shorthand Reporter further certifies to be neither counsel for nor related to any party to said action nor in any way interested in the outcome thereof.

IN WITNESS WHEREOF, I have hereunto subscribed my name October 26, 2021.



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Certified Shorthand Reporter