

WORKERS' COMPENSATION APPEALS BOARD  
FOR THE STATE OF CALIFORNIA

SANDRA ROQUEMORE, )  
 )  
 Applicant, )  
 )  
 vs. ) Case No. ADJ13818144  
 )  
 AMERICAN GUARD SERVICES DBA )  
 on behalf of UNITED WISCONSIN )  
 INSURANCE COMPANY, )  
 administered by NEXT LEVEL )  
 ADMINISTRATORS, )  
 )  
 Defendants. )  
 \_\_\_\_\_ )

VIDEOCONFERENCE DEPOSITION OF SANDRA ANN ROQUEMORE  
Taken on Monday, January 25, 2021, at 11:00 a.m.

REPORTED BY:  
NICOLE JOHNSON  
CSR No. 13030

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Deposition of SANDRA ANN ROQUEMORE, taken on  
behalf of the defendants via Zoom videoconference, at  
11:00 a.m., Monday, January 25, 2021, before Nicole  
Johnson, C.S.R. #13030, as a Certified Shorthand Reporter  
within and for the County of Orange, State of California.

1 APPEARANCES:

2

3 For the Applicant:

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1 Monday, January 25, 2021

2 ooOoo

3 SANDRA ANN ROQUEMORE,

4 was called as a witness, and having been  
5 first duly sworn by the Certified  
6 Shorthand Reporter in accordance with  
7 CCP Section 2094, testified as follows:

8  
9 EXAMINATION

10 BY MR. PETROTTA:

11 Q. Hello, Ms. Roquemore. My name is  
12 Shawn Petrotta. I'm taking this deposition on behalf of  
13 your employer, Cornerstone Capital. Did you have a chance  
14 to discuss the deposition procedures with your attorney  
15 before the deposition today?

16 A. Yes.

17 Q. Okay. How long did you speak with your attorney  
18 regarding the deposition procedures?

19 A. Thirty minutes.

20 Q. Thirty minutes, okay.  
21 Have you ever had your deposition taken before?

22 A. Yes.

23 Q. When was that?

24 A. I don't remember.

25 Q. Okay. Was it within the last five years?

1     **ten years?**

2           A.     Yeah, it was within the last five years, I  
3     think.

4           **Q.     Okay.  And why was it taken?**

5           A.     I was in a car accident.

6           **Q.     Okay.  We'll actually talk about that soon.**

7                   **So besides the car accident, have you had your**  
8     **deposition taken for any other matter?**

9           A.     No.

10          **Q.     Okay.  Can I please get your full name?**

11          A.     Sandra Ann Roquemore.

12          **Q.     Are you known by any other names?**

13          A.     No.  But my maiden name is Edwards.

14          **Q.     So Sandra Ann Edwards, okay.**

15                   **I'm briefly going to go over the deposition**  
16     **procedures again to make sure you understand what we are**  
17     **doing here today.  Basically, the deposition is a chance**  
18     **for me to find out the facts surrounding your injuries so**  
19     **that we may make a determination as to what benefits you**  
20     **may be entitled to.  I'm not trying to trick you or**  
21     **confuse you or say things you don't mean.  I'm merely**  
22     **trying to learn facts related to your claimed injury.**

23                   **Do you understand this?**

24          A.     Yes.

25          **Q.     Okay.  The oath you have just taken is the same**

1 oath that's given in a court of law and subject to the  
2 same penalty of perjury. I remind you to be as honest and  
3 truthful in your answers today because any lies or  
4 misrepresentations could lead to further criminal further  
5 proceedings.

6 Do you understand this?

7 A. Yes.

8 Q. Now, the court reporter is going to transcribe  
9 everything that we say. However, she can only record one  
10 person speaking at a time. Therefore, I ask that you do  
11 not talk while I'm talking and I will afford you the same  
12 courtesy. Okay?

13 A. Okay.

14 Q. Also, the court reporter can only record audible  
15 responses. Therefore, you must answer my questions  
16 verbally. No shrugging your shoulders, no nodding your  
17 head, no "uh-huh" or "huh-uh." It's "yes, no, maybe, I  
18 don't know, I can't recall," et cetera.

19 Do you understand this?

20 A. Yes.

21 Q. Now, there may be questions asked for which you  
22 do not know the exact answer to, but which you may know  
23 the approximate answer to. For example, I might ask you  
24 when a certain event took place, like I did previously.  
25 You may not know the exact answer, but you may know that

1 it happened within a certain month or a certain year or  
2 within a certain time span, like the last five years, the  
3 last three years.

4 In that instance, I am entitled to your best  
5 estimate. However, if you have no idea of the answer,  
6 just let me know that you cannot recall. It's okay if you  
7 cannot recall something. Okay?

8 A. Okay.

9 Q. Don't guess. Please, do not guess because it  
10 does no good for your case and it does no good for mine.  
11 Also, if you don't understand my question or you didn't  
12 hear me, just let me know and I'll clarify it for you.  
13 Okay?

14 A. Okay.

15 Q. Now, after the deposition is over, the court  
16 reporter will type up our conversation in a booklet. She  
17 will send you a copy of the booklet and you will have a  
18 chance to review it for accuracy and make any changes you  
19 feel are necessary to ensure that your testimony is  
20 correct.

21 However, I should warn you that I can use any  
22 substantive changes to discredit your testimony at trial  
23 like changing "no" to "yes" or "yes" to "no" if you did  
24 that later on.

25 Do you understand this?



1           A.    Yes.

2           Q.    Now, I don't know how long the deposition will  
3 last today, but if you need to take a break for any  
4 reason, just let me know and we can take as many breaks as  
5 needed.  Okay?

6           A.    Okay.

7           Q.    Now, have you taken any drugs or medications in  
8 the last 24 hours?  That could also include vitamins, you  
9 know, aspirin, something prescribed to you.

10          A.    Yes.

11          Q.    Okay.  What have you taken?

12          A.    Vitamin C, aspirin, fish oil.  That's about it.

13          Q.    Okay.  Is there any reason that would prevent  
14 you from giving your best, most accurate testimony here  
15 today?

16          A.    No.

17          Q.    Okay.  Perfect.

18                    What is your current address?

19          A.    1763 Exposition Boulevard, Los Angeles,  
20 California 90018.

21          Q.    That's 90008; correct?

22          A.    No, 90018.

23          Q.    Okay.  Sorry about that.

24                    So it's 1763 Exposition Boulevard, Los Angeles,  
25 90018; correct?

1 A. Correct, yes.

2 Q. Okay. How long have you lived there?

3 A. Six years this year.

4 Q. Okay. And who do you live there with?

5 A. No one.

6 Q. Do you rent or do you own that property?

7 A. Rent.

8 Q. Prior to this address, where did you live?

9 A. I don't remember the address at the moment.

10 Q. Okay. Do you know what city it was in?

11 A. Los Angeles.

12 Q. Do you remember the ZIP code?

13 A. 90015.

14 Q. Okay. Do you remember the street name?

15 A. 114th Street -- I mean 14th Street.

16 Q. Okay. And how long did you live there?

17 A. I'm not sure, but I think two years or three  
18 years.

19 Q. Okay. And do you recall where you lived before  
20 that?

21 A. No.

22 Q. Don't even know the street or the city?

23 A. It was Los Angeles.

24 Q. Do you recall the street?

25 A. No.

1 Q. How long did you live at that address?

2 A. About a year.

3 Q. Okay. Not a problem.

4 Can we go off the record, please?

5 THE REPORTER: Yes.

6 (Pause in the proceedings.)

7 Q. (By Mr. Petrotta) Have you ever used any other  
8 social security number?

9 A. No.

10 Q. And was that social security number that you  
11 just provided me issued to you by the United States  
12 Government?

13 A. Yes.

14 Q. Have you ever gone by any other names besides  
15 Sandra Ann Roquemore or Sandra Ann Edwards?

16 A. No.

17 Q. What is your place of birth?

18 A. Los Angeles, California.

19 Q. Have you always lived in the state of  
20 California?

21 A. Yes.

22 Q. What is your date of birth?

23 A. February 11th, 1955.

24 Q. Do you have a driver's license?

25 A. Yes.

1 Q. Can you please hold it up to the camera?  
2 A. I've got to get my purse.  
3 Q. Not a problem. Take your time.  
4 (Pause in the proceedings.)  
5 Q. (By Mr. Petrotta) Okay. Are you married?  
6 A. No.  
7 Q. Have you ever been married?  
8 A. Yes.  
9 Q. What is the name of your ex-husband?  
10 A. Roquemore. Oh, Robert Charles Roquemore.  
11 Q. Okay. And when were you married to Robert?  
12 A. I think it was -- it was either 1976 or 1977.  
13 Q. Okay. To what year?  
14 A. I think to 1981.  
15 Q. Okay. Do you have any kids?  
16 A. Yes.  
17 Q. How many kids?  
18 A. I have three, but two by him.  
19 Q. Okay. So that doesn't matter. So what are the  
20 names of your children?  
21 A. One is deceased.  
22 Q. Okay. I still need the name of all three kids.  
23 A. Oh. My oldest daughter, she's Lee Jones.  
24 Q. Can you spell that, please?  
25 A. L-e-e J-o-n-e-s.

1           **Q.    Okay.  And how old is she?**

2           A.    I think she's 49 or 50.  She was born in '71.

3           **Q.    And your next kid?**

4           A.    Annette Roquemore.

5           **Q.    And how old is Annette?**

6           A.    She's 40.

7           **Q.    And your last child?**

8           A.    Oh.  Wait a minute.  James Earl Roquemore.

9           **Q.    How old is James?**

10          A.    He would have been 40.

11          **Q.    Okay.  So both Annette and James are 40?**

12          A.    Yeah.  They'll only be 40 years old for a couple  
13 of months until next month on her birthday.  That's when  
14 she turns 41.

15          **Q.    Okay.  Got it.  Do you know if Robert works at**  
16 **all?**

17          A.    Robert is deceased.

18          **Q.    Okay.  Got it.  Have you ever had any group**  
19 **medical insurance such as Kaiser, Blue Shield, Medicare,**  
20 **Medi-Cal?**

21          A.    I think I have Medicaid, the blue and white  
22 card.  And I just got my blue and white card.

23          **Q.    Is that Medicaid also?**

24          A.    Medicare.  Medicare -- red, white, and blue.

25          **Q.    Okay.  I'm not quite sure -- I missed something.**

1     **So you've had Medicaid and Medicare or Medi-Cal?**

2           A.    I think it's Medicare.

3           **Q.    C-a-r-e; correct?**

4           A.    Yeah.

5           **Q.    Okay.  Besides Medicaid and Medicare, have you**  
6 **had any other form of Group Health insurance?**

7           A.    No.

8           **Q.    Okay.  Now, have you ever -- now -- strike that.**  
9                   **Have you seen a doctor for any reason under your**  
10 **medical insurance?**

11          A.    Yes.

12          **Q.    Okay.  Are you currently using your Medicare**  
13 **health insurance?**

14          A.    Yes.

15          **Q.    Okay.  Who is the doctor you're currently seeing**  
16 **under Medicare?**

17          A.    Dr. Patel.

18          **Q.    Do you know Dr. Patel's first name?**

19          A.    I don't know.  I don't know his first name, but  
20 I know it's a funny name.  It starts with a K.

21          **Q.    Okay.  Do you know Dr. Patel's address?**

22          A.    Hold on.

23          **Q.    No problem.**

24          A.    It's 4477 West 118th Street, Suite Number 500,  
25 Hawthorne, California 90250.

1 Q. Now, how long have you been seeing Dr. Patel?

2 A. I've been seeing him a long time.

3 Q. More than five years?

4 A. I'm not sure.

5 Q. Okay. You say it's a long time. Has it been  
6 more than two years?

7 A. Yes.

8 Q. Been more than four years?

9 A. I think, yeah.

10 Q. Okay. So besides Dr. Patel, have you seen any  
11 other doctors under either Medicaid or Medicare health  
12 insurance?

13 A. Yes, but I haven't seen that doctor in a minute.  
14 And right now, I don't have a card with his address or  
15 phone number on it.

16 Q. Okay. Do you know who the doctor is?

17 A. Let me see if I wrote it down in my book. No, I  
18 don't have it right now.

19 Q. Okay. We're going to leave a space inside the  
20 transcript. Please, if you find that information, please  
21 add it in, along with the address. Okay?

22 A. Okay.

23 (Information requested: \_\_\_\_\_  
24 \_\_\_\_\_  
25 \_\_\_\_\_.)

1           Q.    So besides Robert, have you been married to any  
2 other person?

3           A.    No.

4           Q.    Do you currently smoke any cigarettes or any  
5 other type of smoke -- vaping? marijuana?

6           A.    No, I don't smoke marijuana, but I do smoke  
7 cigarettes.

8           Q.    How often do you smoke?

9           A.    Not that often. A pack of cigarettes will last  
10 me a couple of days.

11          Q.    How long have you been smoking?

12          A.    Over 10 years.

13          Q.    Okay. Do you drink alcohol?

14          A.    No.

15          Q.    Do you take any illicit or illegal street drugs?

16          A.    No.

17          Q.    Have you ever been convicted of a fraud or  
18 felony crime?

19          A.    No.

20          Q.    Have you ever served in the United States  
21 military?

22          A.    No.

23          Q.    Did you graduate high school?

24          A.    Yes.

25          Q.    What high school did you graduate from?



1 A. Jordan High.

2 **Q. And that's in Los Angeles?**

3 A. Yes.

4 **Q. Did you ever attend college?**

5 A. Yes.

6 **Q. Where did you go to college?**

7 A. UCLA.

8 **Q. Did you graduate?**

9 A. No.

10 **Q. What was your major?**

11 A. Computer science.

12 **Q. And when did you attend UCLA?**

13 A. Oh, I don't remember what year.

14 **Q. Has it been more than 1010 years?**

15 A. Oh, yes.

16 **Q. More than 20?**

17 A. I'm really not sure.

18 **Q. When did you graduate from high school?**

19 A. 1971.

20 **Q. Have you ever attended any type of vocational**  
21 **tech schools or training programs?**

22 A. Yes, but I can't remember the name.

23 **Q. Did you get a certificate or any kind of**  
24 **diploma?**

25 A. I'm not sure.

1 Q. Okay. Do you play any sports?

2 A. No.

3 Q. Have you ever played any sports?

4 A. No.

5 Q. Do you have any hobbies?

6 A. Yes.

7 Q. What are your hobbies?

8 A. Crocheting.

9 Q. Any other hobbies?

10 A. Reading.

11 Q. Anything else?

12 A. That's it.

13 Q. Okay. Do you have any personal interests?

14 A. I don't understand the question.

15 Q. Like, a personal interest. Like, if I were to  
16 bring up my dad, I'd tell people my dad has a personal  
17 interest in Jack the Ripper. Some people have an interest  
18 in religion. I have an interest in cooking.

19 A. I like cooking.

20 Q. Do you do that a lot?

21 A. Yes.

22 Q. What about walking? exercise?

23 A. No.

24 Q. You don't walk? You don't exercise?

25 A. No.

1 Q. Do you do any activities outside the home?

2 A. No.

3 Q. You don't go grocery shopping? Maybe the mall?

4 A. Yeah, I go grocery shopping and go to the  
5 washhouse, but that's about it.

6 Q. Do you mean the laundromat?

7 A. Yes.

8 Q. And when is the last time you went to the  
9 grocery store?

10 A. Last week.

11 Q. What about the laundromat?

12 A. Last week.

13 Q. You go once a week?

14 A. Yes.

15 Q. So what did you do yesterday?

16 A. Mostly cleaned my house and sleep.

17 Q. So what did you do the day before?

18 A. Same thing.

19 Q. Are you currently receiving any source of  
20 income?

21 A. I get retirement. And I work.

22 Q. Do you currently receive social security  
23 retirement?

24 A. Yes.

25 Q. How much do you receive from social security

1 every week or every two weeks?

2 A. It's once a month.

3 Q. Okay. How often do you receive -- how much do  
4 you receive every month from social security?

5 A. Well, I just started this month getting \$1,013.

6 Q. And it just started this month?

7 A. Yes.

8 Q. And when did you apply for social security?

9 A. I don't remember that.

10 Q. Was it the last month? last few months?

11 A. I've only been getting -- I think I started  
12 getting social security when I was 62.

13 Q. Okay. So you've been getting social security  
14 since you were 62?

15 A. Uh-huh, yes.

16 Q. Okay. And you say your currently working?

17 A. Yes.

18 Q. Where are you working at?

19 A. DC Downey.

20 Q. You said DC Downey?

21 A. Uh-huh, yeah.

22 Q. Is that a security service?

23 A. Yes.

24 Q. And that's -- is that the current -- sorry.

25 Is DC Downey the company you were injured with?

1           A.    No.  That's where they put me.  That's my new  
2 post.

3           **Q.    Okay.  So Cornerstone Capital sent you there;**  
4 **correct?  Or AGS?**

5           A.    Yeah.

6           **Q.    And when did AGS, American Guard Services, send**  
7 **you there?**

8           A.    I started there, I think, December the 3rd or  
9 4th.  I was trying to find the paper that I had in my  
10 purse.

11          **Q.    Not a problem.**

12          A.    Oh, okay.  But I know it was sometime in  
13 December.

14          **Q.    Okay.  Early December 2020; correct?**

15          A.    Yeah.

16          **Q.    So you currently pay for all your rent and**  
17 **necessities; correct?**

18          A.    Yes.

19          **Q.    Have you ever had any prior workers'**  
20 **compensation claims?**

21          A.    No.

22          **Q.    Have you ever had any prior State disability --**  
23 **strike that.**

24                   **Have you ever collected State disability**  
25 **benefits before?**

1 A. I don't know.

2 Q. Like, have you ever collected EDD?

3 A. No, I don't think so.

4 Q. Have you ever collected workers' compensation  
5 benefits for any reason?

6 A. No.

7 Q. Have you ever collected unemployment?

8 A. Yes.

9 Q. When did you get unemployment?

10 A. Oh, that's when I was a teenager when I got  
11 fired off my job.

12 Q. Besides when you were a teenager, have you ever  
13 received unemployment for any other reason?

14 A. No.

15 Q. Have you ever had any personal injury claims?  
16 Slip-and-falls, car accidents --

17 A. I had a car accident.

18 Q. What about a slip-and-fall? Somebody hit you?  
19 Somebody rob you?

20 A. No.

21 Q. We'll get to your motor vehicle accident in a  
22 second.

23 Have you ever been involved in any prior  
24 lawsuits such as civil lawsuits? Anybody ever sue you?  
25 Divorce?

1 A. No.

2 Q. So prior to this workers' compensation claim,  
3 have you ever had an attorney?

4 A. Yes.

5 Q. Okay. Do you recall the name of the attorney?

6 A. That was for the car accident.

7 Q. Okay. But do you recall the name of the  
8 attorney?

9 A. Kottler & Kottler.

10 Q. And where are they located?

11 A. 6420 Wilshire Boulevard, penthouse.

12 Q. And that's in Los Angeles; correct?

13 A. Yeah. Los Angeles, California 90048.

14 Q. So besides Kottler & Kottler, have you ever had  
15 any other attorneys?

16 A. No.

17 Q. Do you have a family doctor?

18 A. That's the one I couldn't find his name and  
19 address.

20 Q. Okay. So is Dr. Patel your family doctor as  
21 well?

22 A. No, he's not.

23 Q. What is Dr. Patel?

24 A. He's a pain management doctor.

25 Q. Do you recall -- so you don't have the address

1 of your family doctor?

2 A. No. I can't find it right now.

3 Q. Okay. Do you have the address written down  
4 somewhere, or are you able to find the address?

5 A. That's what I was trying to do. I know -- it's  
6 up the street from my house. It's 3631 Crenshaw  
7 Boulevard.

8 Q. Just give me a second. Is that the Crenshaw  
9 Community Clinic?

10 A. Yeah.

11 Q. So do you see a doctor at that location or -- a  
12 specific doctor at that location or --

13 A. No.

14 Q. Okay. Please remember, let me finish before  
15 you -- before you respond. Okay?

16 A. Okay.

17 Q. Not a problem. But you don't recall the name of  
18 the doctor?

19 A. No, I don't. He has a name I can't pronounce.

20 Q. Not a problem. But it's at the Crenshaw  
21 Community Clinic; correct?

22 A. Correct.

23 Q. And how long have you been going to the Crenshaw  
24 Community Clinic?

25 A. I guess -- I guess about a year or so.



1           Q.    Before the Crenshaw Community Clinic, did you  
2 have a doctor before that?

3           A.    No.

4           Q.    Have you been to the hospital in the last  
5 10 years?

6           A.    Yes.

7           Q.    Okay.  Where -- in the last 10 years, what  
8 hospitals have you gone to?

9           A.    It was for eye surgery.  It wasn't really a  
10 hospital.  It was like a clinic.

11          Q.    Okay.  Well, any other hospitals?  LA+USC?  
12 Martin Luther King?

13          A.    Let me think.

14          Q.    UCLA?  Cedars-Sinai?

15          A.    Dignity Health Hospital.  It was California  
16 Hospital at first.

17          Q.    Dignity Hospital, where are they located?

18          A.    Los Angeles.

19          Q.    Is that 1401 South Grand?

20          A.    Yes.

21          Q.    Okay.  And what did you go there for?

22          A.    A DNC.

23          Q.    What's a DNC?

24          A.    I don't know.  It has something to do with  
25 scraping my uterus or something.

1           **Q.    Okay.  So besides Dignity Hospital, what other**  
2 **hospitals did you go to?**

3           A.    That's it.  That's the only one that I can  
4 remember.

5           **Q.    Have you ever had surgery?**

6           A.    Yes.

7           **Q.    Okay.  What have you -- when did you have**  
8 **surgery?**

9           A.    When I had my kids, I had cesareans.

10          **Q.    Okay.  So when was that?**

11          A.    1971, 1979, and 1980.

12          **Q.    Okay.  So besides the C-sections, have you ever**  
13 **had any other surgeries?**

14          A.    No.

15          **Q.    Okay.  I was actually reviewing your medical**  
16 **report from Dr. Gofnung.  Did you have a -- did you have a**  
17 **cervical fusion approximately five or six years ago?**

18          A.    Oh.  Yeah, I forgot about that one.  Neck  
19 surgery; right?

20          **Q.    Correct.**

21          A.    Yeah.

22          **Q.    And where did you have the cervical fusion done?**

23          A.    California Hospital.

24          **Q.    That's Dignity Hospital?**

25          A.    Yeah.  Dignity Health.

1 Q. On Grand; correct?

2 A. Yes.

3 Q. So besides the C-sections and the cervical  
4 fusion five or six years ago, have you had any other  
5 surgeries?

6 A. No.

7 Q. Have you had any x-rays, MRIs, or other  
8 diagnostic studies performed?

9 A. I don't remember.

10 Q. Have you ever broken any bones?

11 A. No.

12 Q. Have you ever treated in an emergency room in  
13 the last 10 years?

14 A. No.

15 Q. What about urgent care in the last 10 years?

16 A. No.

17 Q. Okay. Have you treated at any medical clinics  
18 in the last 10 years?

19 A. I don't understand.

20 Q. Well, you kind of indicated that you previously  
21 treated at a medical clinic for your eye.

22 A. Oh, yeah.

23 Q. Okay. And so what medical clinic was that?

24 A. Oh, I don't remember. I have all that stuff  
25 wrote down, and I can't find my book that I had it wrote

1 down in right now.

2 Q. Okay. Do you know the address?

3 A. No.

4 Q. Okay. But you do have the address written down;  
5 correct?

6 A. Yes.

7 Q. Okay. We're going to leave a blank inside the  
8 deposition transcript for you to add that information.

9 Okay?

10 A. Okay.

11 Q. So when you're reviewing the transcript and you  
12 find that information, just put it in there. Okay?

13 A. Okay.

14 (Information requested: \_\_\_\_\_  
15 \_\_\_\_\_  
16 \_\_\_\_\_.)

17 Q. So besides the clinic you had your eye surgery  
18 at, have you had any other -- have you treated at any  
19 other medical clinic besides that one?

20 A. No.

21 Q. Okay. So have you ever sought medical attention  
22 for any condition other than those previously mentioned,  
23 like degenerative joint disease, diabetes --

24 A. No.

25 Q. Have you ever been a Kaiser member?

1 A. No.

2 Q. Do you have any chronic health conditions such  
3 as diabetes or degenerative joint disease?

4 A. No.

5 Q. Have you ever sustained any previous orthopedic  
6 injuries?

7 A. Could you rephrase that? I don't understand.

8 Q. Not a problem. So you previously -- from what  
9 you indicated, you previously had a car accident; correct?

10 A. Yeah.

11 Q. And what did you injure in the car accident?

12 A. My back.

13 Q. Is that your upper back? your lower back?

14 A. Lower back.

15 Could you hold on just a second? I need to go  
16 to the little girl's room.

17 Q. Not a problem. Let's take a break.

18 A. Okay.

19 (Pause in the proceedings.)

20 Q. (By Mr. Petrotta) So Ms. Roquemore, besides your  
21 low back, have you ever injured any other body part?

22 A. No.

23 Q. Have you sustained any previous sports injuries?

24 A. No.

25 Q. Okay. Ever had a prior evaluation with an

1       **orthopedist, a chiropractor, or an acupuncturist?**

2           A.    No.

3           **Q.    What about did you receive treatment for your**  
4 **lower back?**

5           A.    Yes.

6           **Q.    And who did you receive treatment with?**

7           A.    Dr. Patel.

8           **Q.    Any other doctors besides Dr. Patel?**

9           A.    No.

10          **Q.    That's the Dr. Patel you previously provided**  
11 **notice of on 118th Street; correct?**

12          A.    Yes.

13          **Q.    Do you still see Dr. Patel?**

14          A.    No.    Just on the phone.

15          **Q.    Okay.  Is Dr. Patel still prescribing your**  
16 **medication or injections?**

17          A.    Yes.

18          **Q.    Who referred you to Dr. Patel?**

19          A.    Oh, that was a long time ago.  I don't remember  
20 who referred me to him.

21          **Q.    Was that your attorney, Kottler & Kottler?**

22          A.    No.

23          **Q.    Did they refer you to any treatment facility?**

24          A.    Yes, for therapy.

25          **Q.    Okay.  Who did they send you to?**

1           A.    I don't remember, but I have it written down  
2 somewhere.  It's in -- where is that?  I have it written  
3 down.  I don't know where it was, but I know I have it  
4 written down somewhere.

5           **Q.    Okay.  We're going to leave another blank inside**  
6 **the transcript.  Once you find that information, just put**  
7 **it in.  Okay?**

8           A.    Okay.

9           **Q.    Or also tell your attorney so that she could**  
10 **tell me.  Okay?**

11          A.    Okay.

12 (Information requested: \_\_\_\_\_  
13 \_\_\_\_\_  
14 \_\_\_\_\_.)

15          **Q.    Let's see.  Have you ever been evaluated by --**  
16 **strike that.**

17                **So how many car accidents have you been involved**  
18 **in either as a driver, a passenger, or a pedestrian?**

19          A.    I was a driver and I got hit from behind.

20          **Q.    Okay.  How many car accidents have you been**  
21 **involved in either as a driver, a passenger, or a**  
22 **pedestrian?**

23          A.    Two.

24          **Q.    Okay.  When was the most recent?**

25          A.    I don't remember, but a couple of years ago.

1 Q. About five or six?

2 A. I think so.

3 Q. Okay. Where did it occur?

4 A. Wilshire and Wilton.

5 Q. In Los Angeles?

6 A. Yes.

7 Q. And what occurred?

8 A. I was riding in a taxi, and it got T-boned.

9 Q. And where did you sustain injury?

10 A. My lower back.

11 Q. Any other body parts?

12 A. No.

13 Q. And when did you seek medical -- did you seek  
14 medical treatment for that injury?

15 A. Okay. I don't understand that part right there.

16 Q. Okay. Not a problem. But you got treatment for  
17 your lower back after the accident; correct?

18 A. Yeah. That's the one that you left a blank for  
19 me to fill in for the therapy.

20 Q. Okay. And did you start treating with Dr. Patel  
21 around the injury?

22 A. Yes, because I was going to him already.

23 Q. Okay. So you were going to him before the car  
24 accident?

25 A. Yes.



1 Q. Okay. Prior to the injury, what were you going  
2 to Dr. Patel for?

3 A. For pain in my lower back.

4 Q. Okay. So you already had lower back pain before  
5 the car accident; correct?

6 A. Yes.

7 Q. The car accident just made it worse; correct?

8 A. Yes.

9 Q. Was there a police report?

10 A. I'm not -- I'm not sure.

11 Q. Do you know who -- do you know if you filed a  
12 claim against the -- against the automobile insurance  
13 company?

14 A. Yes, I did. That was with Kottler & Kottler.

15 Q. Okay. And what was the name of the insurance  
16 company you filed against?

17 A. I don't know. All I know is it was the cab  
18 company.

19 Q. Did you settle?

20 A. Yes.

21 Q. For how much?

22 A. Oh, I forgot that.

23 Q. Not a problem. Okay. What about your second  
24 car accident, when did that happen?

25 A. The second car accident was the cab. The first

1 car accident, I was hit from behind. I was working then.

2 Q. When was that?

3 A. I think 1993 or 1992.

4 Q. Did you sustain any injuries in that car  
5 accident?

6 A. No.

7 Q. It was just a simple fender bender?

8 A. Yes.

9 Q. So besides those two car accidents, you haven't  
10 been involved in any other car accidents?

11 A. No.

12 Q. Okay. So before working for American Guard  
13 Services, who did you work for?

14 A. I wasn't working. I was doing in-home care.

15 Q. Okay. How long were you doing -- okay. So how  
16 long were you doing in-home care?

17 A. Three years before my son passed.

18 Q. And which son is that?

19 A. James Earl Roquemore.

20 Q. And that was through the State of California;  
21 correct?

22 A. Yes.

23 Q. And do you remember the dates in which you were  
24 doing in-home care for your son?

25 A. All I know, when my son first got sick, I

1 started taking care of him until he passed.

2 Q. Okay. And do you remember the year when you  
3 started working for the State of California?

4 A. No, I don't remember the year.

5 Q. Let's try this a different way. When did you  
6 start working for American Guard Services?

7 A. Last year in January.

8 Q. January 2020?

9 A. Yes.

10 Q. Okay. How much time -- so between the time when  
11 you stopped providing in-home care to the time -- strike  
12 that.

13 How much time elapsed between the last day  
14 working in-home care to when you first started working for  
15 American Guard Services?

16 A. My son passed June the 6th. And I started  
17 working for AGS in January.

18 Q. So about six months?

19 A. Yeah. Wait a minute. I forgot -- this is 2021.

20 Q. But you remembered that in-home care was about  
21 for three years and ended on June 6th, 2019; correct?

22 A. Yes.

23 Q. Okay. Did you have a supervisor or anybody that  
24 you reported to?

25 A. No.

1           **Q. Did you have a job title? Just caregiver or --**

2           A. I think it was caregiver.

3           **Q. Okay. What was your rate of pay?**

4           A. Oh, Lord. I would have to find one of these old  
5 check stubs to figure that out. I don't remember.

6           **Q. Not a problem. What were your job duties?**

7           A. I had to bathe him. I had to feed him. I had  
8 to change his diaper, comb his hair, cook for him, wash  
9 his soiled clothes and bed linens, take him back and forth  
10 to the doctor, go pick up his medications. Basically  
11 everything. Cook, clean, and take care of him.

12          **Q. Did you have to carry him?**

13          A. I couldn't pick him up. He could move from the  
14 bed to the wheelchair.

15          **Q. What about getting out of the car?**

16          A. I always had -- the ambulance service always  
17 came and got him to take him to his doctor appointments.

18          **Q. Did you sustain any injuries on the job?**

19          A. No.

20          **Q. And you quit because he passed away; correct?**

21          A. Yes.

22          **Q. Okay. So I have about -- so you started**  
23 **doing -- you started doing in-home care in about 2016, I**  
24 **would estimate; is that correct?**

25          A. I think so.

1 Q. Okay. So before you provided in-home care for  
2 your son, where did you work?

3 A. I wasn't working.

4 Q. Okay. And how long before you started giving  
5 in-home care, how long were you unemployed?

6 A. I would say about 20 years.

7 Q. Okay. So while you were unemployed for  
8 20 years, who would provide for your necessities?

9 A. I was getting SSI then.

10 Q. And why were you receiving social security  
11 income?

12 A. Social security income?

13 Q. Yeah. You said you were unemployed for  
14 20 years.

15 A. Yeah. I was getting SSI.

16 Q. Okay. And why were you getting SSI?

17 A. I don't remember that one.

18 Q. Was it because of an accident or an injury?

19 A. No.

20 Q. Were you disabled?

21 A. No.

22 Q. Were you retired?

23 A. Yes.

24 Q. Okay. When did you -- when did you retire?

25 A. 1995.

1 Q. So you -- so what company were you working for  
2 when you retired in 1995?

3 A. International Rectifier.

4 Q. How do you spell "rectifier"?

5 A. Hold on.

6 Q. Is that r-e-c-t-i-f-i-e-r?

7 A. I think it's r-e-c -- I don't remember how to  
8 spell that.

9 Q. Okay. I think I have it spelled correctly.

10 Do you know where they were located?

11 A. El Segundo, California.

12 Q. And how long did you work for International  
13 Rectifier?

14 A. I think either 10 or 11 years.

15 Q. Do you recall who your supervisor was?

16 A. Lord, have mercy. No, I can't remember that.

17 Q. No problem. And why did you quit?

18 A. I didn't quit. They called it downsizing.

19 Q. So you were laid off?

20 A. Yes.

21 Q. So after you were laid off, you went into  
22 retirement?

23 A. Yes.

24 Q. And you didn't sustain any injuries while  
25 working for International Rectifier; correct?

1 A. I had fell on the job once and hurt my knee.

2 Q. Okay. And what knee did you injure?

3 A. My left knee.

4 Q. Did you treat for your left knee?

5 A. No.

6 Q. Did you get any benefits because of that?

7 A. No.

8 Q. After you quit working for International  
9 Rectifier, did your left knee still cause you problems?

10 A. Yes.

11 Q. Prior to working for American Guard Services,  
12 were you still having left knee problems?

13 A. Yes.

14 Q. Okay. So let's go back to AGS. So you're  
15 currently working for AGS; correct?

16 A. Yes.

17 Q. And your first day was in January 2020; correct?

18 A. Yes.

19 Q. What was the name of the employer you were first  
20 sent to when you started working for AGS?

21 A. Ralphs.

22 Q. And do you know where that Ralphs was located?

23 A. Not offhand, but I know it's far out.

24 Q. Do you know what city?

25 A. Only thing I can say is Los Angeles, California.

1 Q. Not a problem. What was your job title?

2 A. Security guard.

3 Q. Okay. And what was your rate of pay?

4 A. \$16 an hour.

5 Q. And how many days -- how many days a week did  
6 you work?

7 A. Let me see. At that Ralphs, I think it was  
8 five. I'm not for sure.

9 Q. And how many days a week did you work? Strike  
10 that. You already answered that.

11 How many hours a week did you work?

12 A. I think 40, but I'm not for sure.

13 Q. Did you have a supervisor?

14 A. I don't know what that supervisor's name was at  
15 that Ralphs. But at the second Ralphs, that -- I'm not  
16 sure.

17 Q. Okay. Let me try this a different way. How  
18 many different locations have you worked for since you  
19 started working for AGS?

20 A. Repeat that again.

21 Q. Okay. How many locations have you worked for  
22 since you started working for AGS?

23 A. Two.

24 Q. So it was just Ralphs and DC Downey?

25 A. Yes.



1           Q.    Okay.  But did you work at two different Ralphs  
2 locations?

3           A.    Yes.

4           Q.    Okay.  So it's actually three locations;  
5 correct?

6           A.    Two Ralphs and DC Downey.

7           Q.    Okay.  Now, where was the second -- when was the  
8 second Ralphs -- where was the second Ralphs location?

9           A.    North La Brea Avenue.

10          Q.    And that's also in the city of Los Angeles?

11          A.    Yes.

12          Q.    So for the first location -- how long did you  
13 work for the first location?

14          A.    It wasn't that long before they transferred me  
15 to the second location.

16          Q.    Maybe a month?  Two months?

17          A.    I'd say maybe something like that.

18          Q.    Like what?

19          A.    I'm not for sure because I'm not looking at my  
20 book.  I had a book that I had all that written down in.  
21 Right now, I don't know where the book is.

22          Q.    Okay.  But would you estimate that -- how long  
23 would you estimate you worked there?  A month?  two months?  
24 three months?

25          A.    Something like that.

1 Q. Something like what?

2 A. Two or three months.

3 Q. How long did you work for the second Ralphs?

4 A. I think about that time too, two or three  
5 months.

6 Q. And when did you start working for DC Downey?

7 A. December.

8 Q. Okay. And when did you start working for the  
9 second Ralphs location on North La Brea?

10 A. That's what I was looking for. It wasn't that  
11 long -- I can't find my book.

12 Q. Okay. Did you have a different supervisor at  
13 each location?

14 A. Yes.

15 Q. Okay. Do you recall the supervisor at the first  
16 Ralphs location?

17 A. No.

18 Q. Do you recall the supervisor at the second  
19 location?

20 A. No. I need to find that book.

21 Q. Who is your current supervisor?

22 A. I really don't know.

23 Q. Were you provided with health insurance by  
24 American Guard Services?

25 A. I'm guessing so. I'm not for sure.

1           **Q.    Okay.  Were your job duties consistent at both**  
2 **Ralphs locations?**

3           A.    Well, the second Ralphs, I was only working four  
4 days and off three.

5           **Q.    Okay.  And what about currently, are you working**  
6 **five days? four days?**

7           A.    Five.

8           **Q.    And how many hours a week?**

9           A.    Forty.

10          **Q.    And how many hours -- when you were working at**  
11 **the second location when you were only working four days,**  
12 **how many hours were you working?**

13          A.    Thursday and Friday, it was, I think, 2:00 to  
14 10:30.  Saturday and Sunday was 6:00 to 2:30.

15          **Q.    So about 32 hours?**

16          A.    Uh-huh, yes.

17          **Q.    What were your job duties?**

18          A.    A lot of walking and standing.  Basically a lot  
19 of walking.

20          **Q.    Okay.  So besides walking and standing, did you**  
21 **have any other job duties?**

22          A.    No.

23          **Q.    Did you have to carry anything?**

24          A.    No.

25          **Q.    Did the job ever require you to get physical**

1 with anybody?

2 A. They asked me to, but I didn't.

3 Q. So you were never hit by any customers? You  
4 were never pushed?

5 A. No. I was almost hit a couple of times, but  
6 never hit.

7 Q. How many times would you estimate that you were  
8 almost hit?

9 A. About four times.

10 Q. And who tried to hit you?

11 A. A customer that came in the store trying to  
12 steal alcohol.

13 Q. The four times you were almost hit, it was by  
14 the same customer?

15 A. No. Different one.

16 Q. Well, all four times you were almost hit was by  
17 a customer; correct?

18 A. Yes.

19 Q. Okay. Prior to working for American Guard  
20 Services, did you have a preemployment physical?

21 A. No.

22 Q. When was your last day of work for American  
23 Guard Services?

24 A. I'm still working for American Guard Services.

25 Q. Okay. But when is the last day that you worked?

1           A.    Last night.  And I go in tonight.

2           **Q.    And do you have the same job duties -- with your**  
3 **current job, do you have the same job duties of walking**  
4 **and standing?**

5           A.    No.

6           **Q.    What are your duties currently?**

7           A.    Logging the trucks in and out from the 99 Cents  
8 Store.  It's a big distribution center.

9           **Q.    Any other job duties besides that?**

10          A.    No.

11          **Q.    And what's your current job title?**

12          A.    Security guard.

13          **Q.    Do you enjoy the job?**

14          A.    Yes.

15          **Q.    Get along with all your co-employees and**  
16 **supervisors?**

17          A.    Yes.  I work by myself.

18          **Q.    You haven't had any subsequent employment;**  
19 **correct?**

20          A.    I don't understand what that means.

21          **Q.    Like, employment after you -- never mind.**

22                   **Are you working anywhere else besides American**  
23 **Guard Services?**

24          A.    No.

25          **Q.    What about any self-employment?**

1 A. No.

2 Q. So besides American Guard Services, are you  
3 currently working -- are you performing any other kind of  
4 work for money?

5 A. No.

6 Q. Okay. Now, what do you believe you injured as a  
7 result of working for American Guard Services?

8 A. My feet, my lower back -- yeah, because I have a  
9 bad corn and calluses on my feet right now.

10 Q. Okay. So besides your feet and your lower back,  
11 any other body parts?

12 A. My stomach and my head. I have headaches. And  
13 my stomach bothers me.

14 Q. Okay. Any other body parts?

15 A. No.

16 Q. So how do you believe you injured your stomach?

17 A. By not taking my lunch and my breaks when I  
18 needed to take them and eat.

19 Q. Take what?

20 A. Take my lunch and my breaks to eat. And the  
21 stress.

22 Q. And when did you start experiencing symptoms  
23 inside your stomach?

24 A. I'd say about a week after I started working at  
25 the second Ralphs.

1           Q.    Okay. Did you tell anybody that your stomach  
2 was hurting or bothering you?

3           A.    Yes. My coworkers.

4           Q.    Did you ever tell your supervisor?

5           A.    Yes.

6           Q.    Do you recall who the supervisor was?

7           A.    No.

8           MS. FOLEY: Counsel, I apologize. Can I have,  
9 like, five minutes break?

10          MR. PETROTTA: Sure.

11          (Pause in the proceedings.)

12          Q.    (By Mr. Petrotta) Ms. Roquemore, when did you  
13 first tell your supervisor that you were having stomach  
14 problems?

15          A.    Right after they started harassing me on the  
16 job.

17          Q.    Do you recall when that was?

18          A.    No, I don't.

19          Q.    So when did you first start getting treatment  
20 for your stomach?

21          A.    I'm not getting treatment for my stomach at the  
22 moment. I've just been taking Pepto-Bismol.

23          Q.    When did you start taking Pepto-Bismol?

24          A.    When I started having problems at the second  
25 Ralphs.

1           **Q. Do you recall when that was, what month?**

2           A. No, I don't.

3           **Q. You've never seen your personal doctor?**

4           A. No, because they were closed because of the  
5 Corona whatever. They wasn't seeing anybody.

6           **Q. Okay. What about your feet? When did you start  
7 having problems with your feet?**

8           A. Right after I started having problems with them  
9 harassing me on the job.

10          **Q. When did they start harassing you on the job?**

11          A. About a week or two after I started working  
12 there.

13          **Q. Was that the second Ralphs?**

14          A. Yes.

15          **Q. Did you ever get treatment for the problems with  
16 your feet?**

17          A. No, because the doctor's office was closed  
18 because of the Corona virus whatever.

19          **Q. Did you ever request medical treatment from the  
20 employer?**

21          A. No.

22          **Q. Why not?**

23          A. Because -- I didn't because of -- my doctor  
24 wasn't seeing anybody. I didn't know if they knew of  
25 anybody that could see me.



1 Q. Did you ever ask?

2 A. No, I didn't.

3 Q. Did you ever tell the employer you were  
4 having -- or your supervisor you were having problems with  
5 your feet?

6 A. I'm not sure. I don't remember.

7 Q. Regarding your stomach -- I know it's kind of  
8 going back -- but did you ever ask your employer for help  
9 regarding your stomach or --

10 A. No.

11 Q. Let me ask that again. Did you ever ask the  
12 employer for care or medical care for your stomach?

13 A. No.

14 Q. Why not?

15 A. Because they had this stay-at-home order, so I  
16 figured all the doctors offices and hospitals were limited  
17 for patients to see.

18 Q. What about your lower back? When did you begin  
19 having lower back pain?

20 A. Shortly after I started working for the second  
21 Ralphs.

22 Q. Prior to that, did you have any back pain?

23 A. No.

24 Q. At any time while you were working for American  
25 Guard Services, did you obtain any care for your back?

1 A. Yes.

2 Q. With who?

3 A. Dr. Patel.

4 Q. And what did you tell Dr. Patel about the pain  
5 in your back?

6 A. I just told him I was -- my back was still  
7 hurting.

8 Q. Did you tell him why?

9 A. How?

10 Q. Did you tell him why your back was hurting?

11 A. No.

12 Q. What do you believe caused the back pain?

13 A. I guess all the walking and standing that they  
14 was having me doing. Because I was only supposed to walk  
15 every hour. They wanted me to walk every 10 to 15  
16 minutes.

17 Q. What caused the problems with your feet?

18 A. All the walking.

19 Q. Did you ever notify the employer of your back  
20 pain?

21 A. No.

22 Q. Why not?

23 A. I just didn't because I was scared if I started  
24 complaining, I would lose my job.

25 Q. Do you know anybody else that lost their job as

1 **a result of bringing up a medical issue?**

2 A. No, but I don't talk to many people.

3 **Q. Then why did you believe you would get fired?**

4 A. Because that's what I thought.

5 **Q. And why did you believe you would get fired as a**  
6 **result of that? What made you believe that?**

7 A. Because that's what I thought. The less you  
8 complain, the more better for you.

9 **Q. Okay. And what do you believe caused your**  
10 **headaches?**

11 A. Stress. Thinking about all the stuff they were  
12 saying and doing to me on the job.

13 **Q. When did the headaches start?**

14 A. Everything started around the first or second  
15 week after I started working at the second Ralphs.

16 **Q. And who was harassing you or stressing you out?**

17 A. The managers there.

18 **Q. At Ralphs?**

19 A. Yes.

20 **Q. Do you recall their names?**

21 A. One, her name starts with an F. I can't hardly  
22 pronounce her name. But Carlos and Andy, Bryson.

23 **Q. Okay. Did you say Andy?**

24 A. Uh-huh.

25 **Q. Is that a yes?**

1 A. Yes.

2 Q. So you were harassed by Carlos, Andy, Bryson?

3 Anybody else?

4 A. I can't pronounce her name, but her name starts  
5 with -- it's a woman. And her name is hard to pronounce.  
6 All I know is it starts with an F.

7 Q. Okay. We'll get back to the stress. But did  
8 you ever report that to your supervisors at American Guard  
9 Services?

10 A. Yes, I did.

11 Q. Who did you report it to?

12 A. Captain George and Miguel. And there's another  
13 supervisor, but I can't remember his name.

14 Q. And when did you report it to him?

15 A. Right after it started happening.

16 Q. And what did they do about it?

17 A. Came out there to the job to see me.

18 Q. Okay.

19 A. And I was telling him the problems I was having.

20 Q. Okay. So that was Captain George and Miguel?

21 A. Yes.

22 Q. Okay. So they came to your -- so they came to  
23 your Ralphs location, and what did they do?

24 A. They talked to me and asked me what was going  
25 on, and I told them. So after that, I don't know what

1 happened.

2 Q. Did the harassment continue after that?

3 A. Yes.

4 Q. Do you know if they talked to the managers?

5 A. I don't know.

6 Q. Did you ever see a doctor because of the stress?

7 A. No.

8 Q. Did you ever ask anybody at American Guard

9 Services to see a doctor because of the stress?

10 A. No.

11 Q. Why not?

12 A. I just didn't.

13 Q. You don't know why?

14 A. I just didn't.

15 Q. Okay. So when was the first time you received

16 any treatment for your alleged injuries as a result of

17 working for American Guard Services?

18 A. I haven't.

19 Q. Didn't you treat with Dr. Gofnung?

20 A. Oh, yeah.

21 Q. Was that the first doctor you treated with?

22 A. Yes.

23 Q. And how many appointments with -- who sent you

24 to Dr. Gofnung?

25 A. My attorney.

1 Q. And when you saw Dr. Gofnung, were you honest  
2 and truthful with everything you said to him?

3 A. Yes.

4 Q. While you were working for American Guard  
5 Services, were you ever told how to file a workers'  
6 compensation claim?

7 A. No.

8 Q. Did you have any safety meetings?

9 A. Yes. I think.

10 Q. Okay. So did you know about how to file a  
11 workers' compensation claim?

12 A. No.

13 Q. So how did you discover that you could file a  
14 workers' compensation claim?

15 A. I have -- I don't know.

16 Q. Why did you file a workers' compensation claim?

17 A. Why did I file one?

18 Q. Correct.

19 A. I don't know if I did or not.

20 Q. Why did you contact your attorney?

21 A. Because of the stress I was -- the harassment I  
22 was having on my job because I think they didn't want me  
23 there because of my age.

24 Q. Okay. So how many appointments have you had  
25 with Dr. Gofnung?

1 A. Wait a minute. So far nine.

2 Q. Well, how many times have you seen Dr. Gofnung?

3 A. Nine.

4 Q. So each time you went to those nine visits, you  
5 saw Dr. Gofnung?

6 A. No. I don't think -- I don't think -- once I  
7 didn't see him. That's when they told me last week I'd be  
8 coming once a week on a Friday for the next four weeks.

9 Q. For physical therapy?

10 A. Yeah. Yes.

11 Q. So besides Dr. Gofnung, have you treated with  
12 any other doctors for this alleged industrial injury?

13 A. No.

14 Q. What are your current complaints?

15 A. My feet, my toes, my ankles, my headaches --  
16 because I'm getting one now -- and my back.

17 Q. Okay. Have you ever had a physical complaint --  
18 strike that.

19 Have you ever had symptoms in your feet before  
20 you started working for American Guard Services?

21 A. No.

22 Q. And you've had no prior symptoms -- pain or any  
23 other symptoms in your feet prior to working for American  
24 Guard Services?

25 A. No.

1 Q. On a zero to ten scale where zero would be no  
2 pain at all, ten would be, like, you're screaming,  
3 basically, how bad is the pain in your feet?

4 A. I think about a nine. I'm almost to the point  
5 of screaming.

6 Q. Is the pain the same as the first date of  
7 injury, better, worse?

8 A. Worse.

9 Q. What about your toes, did you have any prior  
10 symptoms prior to working for American Guard Services?

11 A. No.

12 Q. And what's the level of pain on a zero to ten  
13 scale?

14 A. Nine.

15 Q. And is the pain the same, better, or worse than  
16 when you first started feeling it?

17 A. Worse, because I had to take off of work  
18 yesterday because of my toes. I worked last -- last night  
19 was, what, Sunday night. I took off -- let me look at my  
20 book. I think I took off Saturday. Yeah, I took off  
21 Saturday.

22 Q. Okay. What about pain in your back, did you  
23 have symptoms in your lower back prior to working for  
24 American Guard Services?

25 A. Yes.



1 Q. Okay. And what is the pain -- what is the pain  
2 in your lower back currently on a zero to ten scale?

3 A. An eight.

4 Q. And the pain -- is the pain better, worse, the  
5 same as when you first started feeling it?

6 A. Worse.

7 Q. And what about your headaches, did you ever have  
8 headaches similar to the ones you have now prior to  
9 working for AGS?

10 A. No.

11 Q. And on a zero to ten scale, how bad are the  
12 headaches?

13 A. About an eight.

14 Q. And is the pain the same, worse, better as when  
15 you first started feeling them?

16 A. The same.

17 Q. Okay. And regarding your feet, how often do you  
18 get pain?

19 A. About every day.

20 Q. What about pain in your toes, how often do you  
21 get it?

22 A. Oh, that's every day. Because I have a great  
23 big corn on my left toe that I've been trying to get off.  
24 Now I have calluses on the side of my feet.

25 Q. Okay. What about your back, how often do you

1 get pain?

2 A. About every day.

3 Q. Prior to working for AGS, did you have pain in  
4 your back every day?

5 A. No.

6 Q. And what about headaches, how often do you get  
7 headaches?

8 A. I didn't get no headaches prior to that.

9 Q. What about currently, how often do you get  
10 headaches?

11 A. Every other day. Because I've got one now.

12 Q. Sorry to hear that.

13 And how long does the pain last in your feet?

14 A. It's hard to say. Because when I go to sleep,  
15 my feet wake me up hurting.

16 Q. Okay. Prior to working for AGS, did you ever  
17 receive any treatment for your feet?

18 A. Only treatment I received for my feet prior, I  
19 had toenail fungus. Nothing else.

20 Q. What about your toes, have you ever received  
21 treatment for your toes prior to AGS?

22 A. No.

23 Q. What about your headaches, did you ever receive  
24 any treatment prior to working for AGS?

25 A. No.

1           **Q.    And how often would you get treatment for your**  
2 **lower back prior to working for AGS?**

3           A.    Now or before?

4           **Q.    Before you started working for AGS, how often**  
5 **would you get care for your back?**

6           A.    About every three to six months.

7           **Q.    Prior to working for AGS, have you ever seen a**  
8 **psychologist, psychiatrist, or marriage or family**  
9 **counselor?**

10          A.    Yes.  I have -- yes.

11          **Q.    Go ahead.**

12          A.    I'm trying to figure out -- you mean have I seen  
13 a psychiatrist or something?

14          **Q.    Yes, prior to working for AGS.**

15          A.    No.

16          **Q.    Have you ever had -- what kind of symptoms are**  
17 **you currently experiencing as a result of the stress?**

18          A.    Well, I've been having nightmares about it from  
19 the things that they were saying to me and dreams.  And  
20 that's when I started getting the headaches when I was  
21 dwelling on it or thinking about it.

22          **Q.    Okay.  Nightmares.  Any other symptoms?**

23          A.    Can't sleep.

24          **Q.    Any other symptoms?**

25          A.    No.  My hair fell out, if that's what you're

1 asking.

2 **Q. And did your hair ever grow back?**

3 A. No.

4 **Q. So you've never seen a psychiatrist,**  
5 **psychologist, or any type of counselor?**

6 A. Okay. Could you rephrase that? You're talking  
7 about now or when?

8 **Q. Prior to working for AGS.**

9 A. Yes, I have.

10 **Q. Okay. When did you see -- what did you see a**  
11 **psychiatrist or a psychologist for prior to working for**  
12 **AGS?**

13 A. Depression.

14 **Q. And who did you see for depression?**

15 A. That's been years ago. I can't even tell you  
16 the doctor's name.

17 **Q. So when is the last time you saw a doctor for**  
18 **depression?**

19 A. I haven't seen one for a long while.

20 **Q. More than 10 years?**

21 A. Yes.

22 **Q. More than 20 years?**

23 A. More than 10.

24 **Q. When did you realize that the symptoms of the**  
25 **nightmares, the sleeplessness, and the hair falling out**

1     **were related to your work with AGS?**

2           A.     Because I had hair again until I started getting  
3 stressed out at the second Ralphs.

4           **Q.     No.  I mean, when did you realize it was a**  
5 **result of work?**

6           A.     Because my hair wasn't coming out before then.

7           **Q.     No, no.  That's not what I'm asking.  I'm asking**  
8 **when?  What time did you realize that it began happening?**  
9 **Was that six months ago?  Nine months ago?**

10          A.     Oh.  Right after I started working for the  
11 second Ralphs.

12          **Q.     And when did you stop working for the second**  
13 **Ralphs?**

14          A.     When I started working for DC Downey.

15          **Q.     So your last -- your last time working for that**  
16 **second Ralphs was in maybe November?**

17          A.     No.  It was -- let me look at this book.  I  
18 think it was.  No, it was in December because -- I think  
19 my last date at Ralphs was December 1st.

20                 I've got to find my charger because my battery  
21 is getting low on my phone.

22          **Q.     Okay.  No problem.**

23                 **(Pause in the proceedings.)**

24          **Q.     (By Mr. Petrotta) When did you first seek legal**  
25 **assistance in this case?**

1 A. I don't remember that date either.

2 **Q. Do you recall what month it was?**

3 A. No, because -- no, I don't remember.

4 **Q. Do you know if it was at the end of 2020?**

5 A. This is January. It had to have been in -- it  
6 had to have been -- I guess in December. But this is  
7 January.

8 **Q. Okay. And how did you find your attorney?**

9 A. Through a friend.

10 **Q. And why did your friend refer you to your**  
11 **attorney?**

12 A. Because I asked her.

13 **Q. What did you ask her?**

14 A. I asked her if she knew somebody I could talk  
15 to.

16 **Q. For what?**

17 A. For the stress I'm going through and having on  
18 the job.

19 **Q. So have you been examined by a psychologist, a**  
20 **psychiatrist, or some kind of counselor as a result of**  
21 **your attorney?**

22 A. No.

23 MS. FOLEY: Counsel, I suggest you ask her if  
24 she was referred to the psychologist, perhaps.

25 **Q. (By Mr. Petrotta) Have you been referred to any**

1 **psychologist or psychiatrist for your industrial injury?**

2 A. No.

3 **Q. When did the alleged harassment begin?**

4 A. The first or the second week at the start of  
5 working for the second Ralphs.

6 **Q. And were there any specific incidents of**  
7 **harassments that you remember?**

8 A. Yeah.

9 **Q. Okay. What were they?**

10 A. One said I smelled like s-h-i-t. One said I  
11 smelled like urine. One said I smelled like a dog. One  
12 said I smelled like I been drinking. One said I smelled  
13 like I'm drunk and that the customers were complaining.  
14 That type of stuff.

15 **Q. Anything else?**

16 A. They didn't want me to shop at that store.

17 **Q. Why?**

18 A. They just didn't want me to shop there.

19 **Q. Anything else?**

20 A. That's about it. I forgot to add George's name.  
21 He's one I've been getting harassed by.

22 **Q. George?**

23 A. Uh-huh, yes.

24 **Q. And how long did the harassment continue?**

25 A. Until I left.

1           **Q.    So how many months?**

2           A.    Only been going a month.  I just left there the  
3 first of December.

4           **Q.    So was it over two months? three months? four**  
5 **months?**

6           A.    I don't understand that particular question.

7           **Q.    How long has the harassment been going on for?**

8           A.    The whole time I was there.

9           **Q.    And how many months were you there?**

10          A.    I'm not sure really because I've been trying to  
11 find my book to see how long I was there at that store.  I  
12 don't know.  But I say two or three months, and I'm  
13 guessing.

14          **Q.    And did you ever specifically tell your**  
15 **supervisors at American Guard Services that they were**  
16 **telling you you smelled like pee or you were drinking or**  
17 **drunk?**

18          A.    Yes, I told them.

19          **Q.    And what did they do?**

20          A.    Oh, I don't know.

21          **Q.    And who has specifically harassed you?**

22          A.    Fracintha.  That's her name.  Fracintha and  
23 George are the main ones that harassed me.

24          **Q.    Okay.  So what was her name?**

25          A.    Fracintha.



1 Q. How do you spell that?

2 A. Oh, I have no idea. I know it starts with an F.

3 Q. Okay. So besides Fracintha and George, were  
4 there any other people?

5 A. Andy, Carlos, Bryson.

6 Q. And they all work for -- do they work for  
7 American Guard Services or Ralphs?

8 A. Ralphs.

9 Q. Did any of your supervisors or managers from AGS  
10 ever harass you?

11 A. No.

12 Q. And where did this harassment occur?

13 A. Excuse me?

14 Q. Where did the harassment occur? Was it on the  
15 floor? Was it in the break room?

16 A. On the floor.

17 Q. Every time?

18 A. Yes.

19 Q. And what were they doing that you considered  
20 harassment?

21 A. By the things that they were saying about me,  
22 but they would say it loud enough for me to hear it.

23 Q. Did they say them directly to you, or were they  
24 just, you know, talking to other people?

25 A. Talking to other people.

1 Q. But they never said it to you directly?

2 A. No.

3 Q. Did anyone witness the incidents?

4 A. Yeah. A couple of my coworkers.

5 Q. Do you recall their names?

6 A. I think her name is Kayla Marshall. Marcus -- I  
7 don't know his last name -- he's an armed guard. Mark,  
8 he's an armed guard.

9 Q. Hold on. You said Kayla Marshall?

10 A. Uh-huh.

11 Q. Marcus?

12 A. Uh-huh.

13 Q. Who else?

14 A. Mark.

15 Q. Anyone else?

16 A. Yeah. I'm trying to think of his name. He  
17 works for Ralphps. Alejandro.

18 Q. Do you recall the supervisors you told about the  
19 harassment?

20 A. The supervisors for where?

21 Q. For AGS.

22 A. Captain George and Miguel.

23 Q. Do you know if you ever sought psychological  
24 counseling because of the alleged harassment at work?

25 A. I haven't seen one -- I haven't seen one.

1 Q. Did you ever ask the employer for psychological  
2 health?

3 A. No.

4 Q. Why not?

5 A. I just didn't.

6 Q. Have you ever received group therapy or  
7 individual therapy?

8 A. No.

9 Q. Did anyone other than your attorney suggest you  
10 file a workers' compensation claim?

11 A. No.

12 Q. Were you ever disciplined while working at AGS?

13 A. No.

14 Q. Have you ever received any verbal or written  
15 warnings about your performance while working for AGS?

16 A. No.

17 Q. Has any member of your family ever seen a  
18 psychiatrist, psychologist, social worker, or counselor  
19 for advice or treatment?

20 A. I don't know.

21 Q. Have you ever used any illegal drugs such as  
22 marijuana, coke, crack, PCP, speed, or pills?

23 A. No.

24 Q. Have you ever been hospitalized for mental  
25 problems?

1 A. Yes.

2 Q. When?

3 A. That was years ago.

4 Q. More than 10 years ago?

5 A. That's a good question. I'm not sure how long  
6 ago it was.

7 Q. Do you remember where you were hospitalized for  
8 mental issues?

9 A. No. I'm not for sure about that one either.

10 Q. Do any of your children have problems with  
11 alcohol or drugs?

12 A. No.

13 Q. Were you ever physically abused as a child?

14 A. No.

15 Q. What about as an adult?

16 A. No.

17 Q. Were you ever sexually abused as a child?

18 A. No.

19 Q. What about as an adult?

20 A. No.

21 Q. How is your relationship with your surviving  
22 children?

23 A. Good.

24 Q. No problems?

25 A. No.

1 Q. And how would you describe your marriage to  
2 Robert? Was it good? Was it bad?

3 A. It was good.

4 Q. Any spousal abuse?

5 A. No.

6 Q. Are you able to perform simple and repetitive  
7 tasks currently?

8 A. Meaning?

9 Q. Cleaning, cooking, all that kind of stuff.

10 A. Yeah.

11 Q. Are you able to do your current job working at  
12 the 99 Cents distribution location?

13 A. Yes.

14 Q. Have you ever filed for bankruptcy before?

15 A. Yes.

16 Q. When?

17 A. I know that's been over 20 years ago.

18 Q. Any more recent bankruptcies?

19 A. No.

20 Q. Within the last five years, have there been any  
21 deaths in the family?

22 A. Yes.

23 Q. Who?

24 A. My son died -- passed in 2019.

25 Q. Anybody else?

1 A. My mother passed, I think, this year.

2 **Q. Were you close to your mother?**

3 A. No.

4 **Q. Were you close to your son that passed?**

5 A. Yes.

6 **Q. Anybody else?**

7 A. No.

8 **Q. Have you suffered the loss of any close friends?**

9 A. No.

10 **Q. Have there been any births in your close family**  
11 **recently?**

12 A. I really don't know that one.

13 **Q. Have there been any divorces in your family**  
14 **recently?**

15 A. No.

16 **Q. Have there been any arrests in your family in**  
17 **the last two or three years?**

18 A. No. Because me and my family is not really  
19 close. So a lot of questions you asking me about them, I  
20 don't know.

21 **Q. Not a problem.**

22 **Have any members of your family been in a car**  
23 **accident recently?**

24 A. I don't know.

25 **Q. Have you or any members of your family been a**

1 **victim of a violent crime?**

2 A. I haven't.

3 **Q. What about your family members?**

4 A. I don't know.

5 **Q. Have any of your family members been seriously**  
6 **ill?**

7 A. I don't know.

8 **Q. What about your son?**

9 A. Yeah, he was ill.

10 **Q. Was that about it?**

11 A. Yes.

12 **Q. What about any of your close friends, have they**  
13 **been seriously ill?**

14 A. No.

15 **Q. Have you or any of your families ever gone**  
16 **through a foreclosure?**

17 A. Foreclosure? I'm not sure on that one.

18 **Q. Like, your house was taken by a legal proceeding**  
19 **or your car.**

20 A. I think -- I'm not for sure on that one.

21 **Q. What about repossession, have you ever had any**  
22 **repossessions?**

23 A. No.

24 **Q. What about any unlawful detainers such as being**  
25 **evicted?**

1 A. No.

2 Q. Have you or any of your family members ever been  
3 evicted from a rental property?

4 A. I haven't, but I don't know about the family.

5 Q. Have any of your relatives or close friends  
6 moved away from you?

7 A. No.

8 Q. Have you or any of your family members been  
9 hospitalized in the last two years?

10 A. No.

11 Q. Have you or any of your family members been --  
12 had a gunshot wound?

13 A. No.

14 Q. Ever been stabbed?

15 A. No.

16 Q. Any of your family members ever been stabbed?

17 A. I don't know.

18 Q. What about raped?

19 A. I don't know that either.

20 Q. Have you ever been raped?

21 A. No.

22 MR. PETROTTA: Counselor, do you have any  
23 follow-up questions?

24 MS. FOLEY: Yes, I do.

25



EXAMINATION

1  
2 BY MS. FOLEY:

3 **Q. Sandra, you complained about your eyes. Can you**  
4 **explain to us what exactly is happening to your eyes?**

5 A. When I was working at Ralphs, they wanted me to  
6 stand right there in front of the door when it would open  
7 and close with the customers coming in and out. And the  
8 dust and the dirt from outside would irritate my eyes and  
9 caused them to hurt because I had surgery on both eyes.  
10 With the wind.

11 **Q. Okay. What about your hair, you briefly told us**  
12 **that you've been losing hair while working with your last**  
13 **employer. You link that to the stress that you**  
14 **experienced. Tell us why.**

15 A. The stress that I was experiencing caused my  
16 hair to come out because I wasn't able to sleep or eat or  
17 do anything worrying about what was going to happen.  
18 Every time I had to go back to work, that's when I started  
19 having the diarrhea and taking the Pepto-Bismol or  
20 something to settle my stomach so I could go in.

21 Because they see me going back and forth to the  
22 bathroom and say I must be having stomach problems.  
23 That's because they were stressing me out. And I'd get  
24 the diarrhea before I'd get to work and after I get there.  
25 The Pepto-Bismol wasn't doing any good to stop it. I

1 didn't stop having the runs until after I left Ralphs.

2 Q. Is that the reason that you requested to be  
3 transferred to a different location?

4 A. Yes.

5 Q. Have you been transferred?

6 A. Yes.

7 Q. Do you feel better now?

8 A. Yes.

9 Q. So at the first location when you'd been  
10 experiencing stress, you mentioned that you believed it  
11 was age related. Would you please explain?

12 A. Well, mainly at the Ralphs, there's mainly young  
13 people there. I was the oldest person there for, like --

14 Q. How old are you right now? I apologize.  
15 How old are you right now?

16 A. I'm 65. I'll be 66 next month.

17 Q. Was there anyone of your age?

18 A. No.

19 Q. So is that your impression that they wanted to  
20 get rid of an older person?

21 A. Yes. Because all of them, I think, was in their  
22 early 20s.

23 Q. Was the reason that you didn't complain to the  
24 supervisor, you were afraid of losing your job because of  
25 your age?

1           A.    Yes.

2           **Q.    Tell me please, do you remember how you'd been**  
3 **hired to that place?**

4           A.    I got transferred from the first Ralphs because  
5 the manager over there told me I can only use the bathroom  
6 on my lunch and my break.  So I --

7           **Q.    Do you remember -- I apologize.  Finish.**

8           A.    He told me I could only use the bathroom on my  
9 lunch and my break.  And by me being an older woman, I  
10 have to go potty a lot more.  And he was telling me maybe  
11 it was because I was drinking too much water.

12          **Q.    Okay.  Do you remember being instructed about**  
13 **your rides to get medical treatment if you have**  
14 **work-related injuries?**

15          A.    I don't have no ride.  I would have to call a  
16 cab.

17          **Q.    Did anyone explain to you how should you report**  
18 **your industrial injury, if any?**

19          A.    During orientation, I think they did.  But with  
20 everything that's been going on, I don't remember a whole  
21 lot of things.

22          **Q.    Do you have any issues with your memory, as far**  
23 **as you know?**

24          A.    As far as I know, I don't have any issues.  But  
25 certain things that I can remember because I've been

1 thinking about the way they were treating me. Because I  
2 couldn't figure out why they were doing it to me until I  
3 started looking at everybody else that I was working  
4 around was younger than me.

5 **Q. Did you know that you can have medical treatment**  
6 **if you're injured at work?**

7 A. I'm sure I could, but I didn't know.

8 **Q. Can I ask you if you remember being referred to**  
9 **a psychologist by our office, Dr. Flores? Do you remember**  
10 **that?**

11 A. No, I really don't. Because I don't even -- no,  
12 I don't remember.

13 MS. FOLEY: I have no further questions.

14 MR. PETROTTA: Real quick follow-ups,  
15 Ms. Roquemore.

16

17 FURTHER EXAMINATION

18 BY MR. PETROTTA:

19 **Q. Thank you for all your attention so far. I just**  
20 **have a few more questions.**

21 **When did you have surgery on your eyes?**

22 A. They did the right eye in November and the left  
23 eye in December. Or either it was October or November. I  
24 know it was before Christmas.

25 **Q. Of 2020?**

1 A. Yes.

2 Q. So last year; correct?

3 A. Yeah. I had it last year.

4 Q. Now, did you have eye issues before you started  
5 working for AGS?

6 A. No.

7 Q. Who referred you over to the eye doctor to have  
8 the surgery?

9 A. Well, I had an eye doctor -- I don't know. I  
10 forgot who -- I think the Crenshaw doctor over there  
11 referred me over there because my vision was cloudy.  
12 Because I had glaucoma and cataract. So they replaced the  
13 lenses in my eyes.

14 Q. So do you believe you have problems remembering  
15 things? Do you believe you have any issues remembering  
16 things currently?

17 A. No.

18 Q. Do you believe that -- do you have any --

19 MS. FOLEY: Counsel, I have one more question.  
20 Could I?

21 MR. PETROTTA: Go ahead.  
22

23 FURTHER EXAMINATION

24 BY MS. FOLEY:

25 Q. Did you discuss your pain of any of your body

1 **parts with any of your coworkers, if you remember?**

2 A. Yes, I did.

3 **Q. Do you remember their names?**

4 A. Yes. I just gave them to him. Kayla, Mark,  
5 Marcus, and Alejandro.

6 MS. FOLEY: Okay. Thank you.

7

8 FURTHER EXAMINATION

9 BY MR. PETROTTA:

10 **Q. Do you know if any of those coworkers are**  
11 **supervisors, or are they just regular coworkers?**

12 A. The armed guards, I'm not sure about them. But  
13 I know when the armed guards are there, I have to do what  
14 they tell me to.

15 **Q. But are they your official supervisors?**

16 A. No.

17 **Q. Okay.**

18 MR. PETROTTA: Any other questions, Natalia?

19 MS. FOLEY: No.

20 MR. PETROTTA: Shall we stipulate to relieve the  
21 court reporter of her duties under the California Code of  
22 Civil Procedure; that the applicant attorney will take  
23 custody of the original transcript; that the deposition  
24 will be signed under penalty of perjury by the applicant;  
25 that I will be notified of any changes within 45 days;

1 that if an original transcript is not available at any  
2 time, we will stipulate to use a certified copy in its  
3 place; lastly, that the parties will stipulate that the  
4 applicant will provide the information inside the blanks  
5 of the transcript.

6 MS. FOLEY: So stipulated.

7 MR. PETROTTA: So stipulated.

8 (The deposition concluded at 1:29 p.m.)  
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DECLARATION UNDER PENALTY OF PERJURY

I, SANDRA ANN ROQUEMORE, do hereby certify under penalty of perjury that I have read the foregoing transcript of my deposition taken on January 25, 2021; that I have made such corrections as appear noted herein; that my testimony as contained herein, as corrected, is a true and accurate transcription of my testimony.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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SANDRA ANN ROQUEMORE



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CORRECTION SHEET/ERRATA SHEET

I, SANDRA ANN ROQUEMORE, do hereby certify that I have read the foregoing statement and that, to the best of my knowledge, said statement is true and accurate (with the exception of the following changes listed below):

PAGE	LINE	CHANGE TESTIMONY TO READ AS FOLLOWS:
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REPORTER'S CERTIFICATION

I, Nicole Johnson, do hereby certify:

That I am a licensed Certified Shorthand Reporter, duly qualified and certified as such by the State of California.

That prior to being examined, the witness named in the foregoing deposition was duly sworn to testify under oath.

That the preceding deposition was recorded stenographically by me at the time and place herein mentioned; and that the preceding pages constitute a complete and accurate record of the testimony given by the aforementioned witness.

That I am a neutral party, in no way interested in the outcome of said action, and that I am not related to or otherwise connected with any of the parties involved with this matter, or their respective counsel.

Dated: February 3, 2021



Nicole Johnson, CSR No. 13030