

BEFORE THE WORKERS' COMPENSATION APPEALS BOARD

STATE OF CALIFORNIA

SANDRA SEERAM,)
)
 APPLICANT,)
)
 VS.) WCAB NO.: ADJ12217188,
) ADJ12217216
 JP MORGAN CHASE;) VOLUME II (PAGES 91-121)
 BROADSPIRE BREA;)
)
 DEFENDANTS.)
 -----)

DEPOSITION OF SANDRA SEERAM

VOLUME II

TAKEN ON REMOTELY

FRIDAY, JULY 24, 2020

KIMBERLY S. HANNA, CSR NO. 12230

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VOLUME II OF THE DEPOSITION OF SANDRA SEERAM,
 taken remotely, on behalf of the Defendants, commencing
 at 10:03 a.m., Friday, July, 24, 2020, before
 Kimberly S. Hanna, Certified Shorthand Reporter, License
 No. 12230, for the State of California, pursuant to
 Notice.

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I N D E X

WITNESS:

SANDRA SEERAM,	<u>PAGE</u>
Examination by Mr. Fleishman	95
Examination by Ms. Foley	111

INFORMATION REQUESTED

(None)

E X H I B I T S

(None offered)

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FRIDAY, JULY, 24, 2020

AT 10:03 A.M.

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SANDRA SEERAM,

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

EXAMINATION

BY MR. FLEISHMAN:

Q. Morning, once again. Since we are on Volume II of your deposition, I won't be going through some of the same information over again. My goal is, obviously, not to cover anything we have already covered before.

Nonetheless, we are going back on the record, so I'm going to repeat some of the admonitions I gave to you before regarding your oath and the transcript, et cetera.

So, as you know, we are here for the Volume II of your deposition regarding your work-related injury allegations against Chase. Just as last time, even though we are doing an informal video conference deposition. You are under oath to testify truthfully and accurately under the penalty of perjury.

And, of course, your testimony has the same

1 force and effect as it would in a court of law before a
2 judge or a jury.

3 Do you understand?

4 A. Yes.

5 Q. Do you recall the difference between
6 estimating and guessing?

7 A. Yes.

8 Q. And, of course, just like last time, unless we
9 go off the record, the court reporter will be making a
10 transcript of all of the testimony and questions here
11 today. You will have the opportunity to review that
12 transcript, correct any testimony that needs to be
13 corrected. Of course, significant changes and numerous
14 changes may reflect badly on your credibility if we go
15 to trial.

16 Do you understand?

17 A. I understand.

18 Q. Please allow me to finish my questions before
19 you answer since we do have a court reporter making the
20 transcript, and it's difficult to keep up if we are
21 talking over one another. Remember to use verbal
22 responses. Avoid "uh-huh" and "huh-uh."

23 Understand?

24 A. Understand.

25 Q. We got pretty far the last time through my

1 questions so this should be fairly quick. But if for
2 some reason, before we finish today, if you need a
3 break, of course, just like last time, just let me know.

4 A. Okay?

5 MS. FOLEY: Counsel, before we continue, I see
6 five windows on the screen. Who is that Schall Court
7 Reporters? And why are they present for this
8 deposition?

9 Kim, this is a question for you.

10 THE COURT REPORTER: Oh, I'm sorry. They just
11 monitor it to make sure there are no problems with the
12 audio or anything.

13 MS. FOLEY: We usually don't have anyone who
14 is not part of the deposition.

15 THE COURT REPORTER: Do you want me to call
16 them and tell them to go off?

17 MS. FOLEY: I want them to disconnect.

18 MR. FLEISHMAN: I thought we had somebody last
19 time.

20 MS. FOLEY: No, no. Usually they are present
21 at the beginning just to make sure that everything is
22 fine, and then they disconnect.

23 (A short break was taken)

24 MR. FLEISHMAN: Okay. We are back on the
25 record.

1 Q. I believe we left off last time, and I had
2 begun asking you -- I believe we left off talking about
3 your primary care physician.

4 Are you still seeing Dr. Denise Hom as your
5 primary care physician?

6 A. Yes.

7 Q. And how long has she been your primary care
8 physician?

9 A. Since -- I'm trying to think. I am going to
10 estimate around -- I don't have the exact date -- 2007.

11 Q. Okay. So during the period of time since
12 2007, you have not always lived in California, though,
13 right?

14 A. Right.

15 Q. Okay. So you've had her sort of on and off?

16 A. Correct.

17 Q. And I know you've mentioned that you have seen
18 a Dr. Curtis. Is his office still closed, to your
19 knowledge?

20 A. To my knowledge, I guess we just shut down
21 again.

22 Q. In terms of your treatment for your
23 work-related injuries, besides Dr. Curtis, has Dr. Hom
24 provided you treatment?

25 A. She's an Internal Medicine. So I have

1 treatment through physical medicine.

2 Q. Okay. If you could, to the best of your
3 recollection, give me the names of any doctors that
4 you've seen, aside from Dr. Curtis, which we have
5 already discussed a little bit, any of the names of the
6 doctors that you can recall seeing for your work-related
7 conditions.

8 A. Okay. I'm going by memory.

9 Q. Let me ask you this before I ask you to list
10 everything from memory. Would any of those doctors
11 besides Dr. Curtis be outside of Kaiser?

12 A. Yes.

13 Q. Okay. Let's, if you can, to the best of your
14 recollection, list the doctors outside of Kaiser that
15 you've seen besides Dr. Curtis.

16 A. That would be one -- It's a center through
17 workers' comp. That would be the Wellness Center in
18 Long Beach. So I think there's like a group of doctors.
19 Dr. Iseke.

20 Q. Dr. What?

21 A. Iseke, I-s-e-k-e.

22 Q. Okay.

23 A. Includes Dr. Kim. There's a group in that
24 center. I don't know all of the names. But they would,
25 you know, like weekly have me see chiropractors and

1 physical therapists and try to do exercises. But I know
2 Natalia would have reports on that.

3 Q. We might as well.

4 A. Okay.

5 Q. I just want to make sure we are not missing
6 stuff.

7 A. Then the rest would be through Kaiser.

8 Q. Okay. Great. Do you recall the last time you
9 were down at the Wellness Center?

10 A. I think January of this year. And then I was
11 trying to get to go back in because I had to wait a
12 couple months. And everything got closed down through
13 Covid 19.

14 Q. Right. So as far as you know, they are not
15 open for business right now?

16 A. They are open. But I haven't been able to --
17 I didn't get approval to go back in.

18 Q. I see. Have you ever been diagnosed with
19 diabetes?

20 A. No. Would you like me to go through the
21 Kaiser doctors now?

22 Q. No, because we received your records from
23 Kaiser. So as far as I am aware, if you saw somebody at
24 Kaiser, we saw the records already.

25 So my main concern was making sure that there

1 were no other doctors' reports floating around that we
2 have not had an opportunity to see just so we have a
3 complete record, because I believe there's a QME
4 appointment very soon.

5 A. Yes.

6 Q. So we probably would not be able to get any
7 records before then. But at least if we know something
8 is missing, we can try to get it and send it to the QME
9 so that he or she has an opportunity to review it as
10 well.

11 A. I just had a bone scan done that just came
12 back also.

13 Q. Was that at Kaiser?

14 A. Yes. It was on July 14th.

15 Q. Since that's too recent -- I think that's too
16 recent for us to have received the records that we did
17 get from Kaiser. If you have access to that, the
18 results of that scan --

19 MS. FOLEY: I'll send you the copy. I've got
20 the copy.

21 MR. FLEISHMAN: Perfect.

22 Q. I was going to say, "Send it to your attorney,
23 and have her send it along to us." Okay. You're
24 already one step ahead.

25 So you said you've never been diagnosed with

1 diabetes. Have you ever been diagnosed with high blood
2 pressure?

3 A. No.

4 Q. High cholesterol?

5 A. Yes.

6 Q. Have you ever had an ulcer?

7 A. No.

8 Q. Have you ever been diagnosed with angina?

9 A. No.

10 Q. Have you ever been diagnosed with arthritis?

11 A. Recently, yes.

12 Q. How recently?

13 A. In the last couple of years.

14 Q. Have you ever been hospitalized overnight or
15 longer?

16 A. For giving birth.

17 Q. So outside of giving birth, any overnight or
18 longer hospitalizations?

19 A. No. I was released before overnight.

20 Q. Have you undergone any surgical procedures?

21 A. No.

22 Q. I know this may be a more difficult question
23 because of the fact that we have had about a month since
24 your deposition technically began.

25 But to the best of your recollection, have you

1 suffered any other work-related or non work-related
2 injuries that we have not discussed previously?

3 A. No. Wait. I better go back because we just
4 got the bone scan back. It's called "bone lesions."

5 Q. This may be something that is not covered or
6 something that you don't know the answer to.

7 A. Sure.

8 Q. But if you do, do you know if those lesions
9 are the result of -- Were you advised whether those
10 lesions would be considered part of your work-related
11 injuries or something new?

12 A. I have an appointment on Tuesday with Dr. Hom
13 to discuss that, yes.

14 Q. What part of the body was scanned?

15 A. The entire body.

16 Q. Okay. When did you say that the appointment
17 is?

18 A. July 28, 2020.

19 Q. Can you describe your typical daily activities
20 and routine since you went off work?

21 A. It's more of -- if you can see my face. I
22 know it's embarrassing. It's a lot of face care now. I
23 have broken out everywhere. And it's horrible. So I
24 try to take care of the face. I have gone to multiple
25 dermatology appointments. The pain is very

1 excruciating. So I try to take a lot of vitamins to
2 help with the pain and try to care for the bone. So
3 it's not more losses. And I don't do -- I try to rest
4 more. It's not like what I could do before. It's
5 more -- I don't sleep as much. My mind is just
6 wandering. I am not the same person. I can't --
7 Everyone thinks, "Oh, she's home. She can do all this
8 or that." It's not the same. The kids are in their
9 room. My son is working. My daughter is trying to get
10 ahead, so she's taking the online college classes. So
11 she's busy. I think the day just gets away, depressed.
12 I don't know how the day goes.

13 I have the long-term Disability trying to give
14 me a hard time. So I've gone out once, trying to get
15 something. And you can't pick up what you want to get.
16 So back home. I've tried to do that once in a while.
17 That just doesn't really help. You don't drive the car,
18 so that's going. But that's okay. I'll deal with that
19 later on.

20 I watch TV, but that does not work. Heat up
21 whatever is left over. That's lunch. For breakfast,
22 maybe oatmeal for breakfast. It's not much. The day
23 just goes by, I think. I take a shower once a day.

24 There is a lot of fighting that goes on in the
25 house. That's what the day has become. Maybe once a

1 week, everyone goes out, and then I'll be home.

2 It's not much that goes on in a day. Take
3 medicines and vitamins morning and night. Some days,
4 Kaiser has me on a lot of the -- as you'll probably see
5 in the records. It tells you about the doctor's
6 appointments. Not much for the day.

7 Long-term Disability, you know, sending in
8 paperwork, trying to get social security. Chase never
9 paid me for long-term Disability. I was a Washington
10 Mutual employee. So a thousand hours of sick time is
11 lost. That's sad. Not much of a day. That's about it
12 for the day. Mostly fighting every day. There is a lot
13 of fighting that goes on in the house. The
14 relationships are not the same anymore. It's not the
15 Covid 19, I can tell you that.

16 Q. What is not the same?

17 A. The relationships in the house are not the
18 same. A lot of worrying on my part, a lot of anxiety.
19 I don't think I'm the same anymore. I don't look the
20 same.

21 Q. When we did the first volume of your
22 deposition, you mentioned diverticulitis and having some
23 dietary struggles, I guess, I would say. And I'm
24 curious. Have you seen any changes in your weight since
25 your symptoms began?

1 A. I've actually gained weight. I think it's
2 from maybe the stress or...

3 Q. To the best of your knowledge, how much has
4 your weight increased?

5 A. About six pounds.

6 Q. In terms of household activities, are you able
7 to do typical cleaning like vacuuming or sweeping?

8 A. None.

9 Q. No household cleaning?

10 A. None.

11 Q. Do you do any cooking?

12 A. I can make some eggs for myself. I have a
13 Keurig for my oatmeal. The majority that we do for like
14 our ethnic cooking, I cannot do anymore. It's a major
15 problem for my husband. So he's learned. My kids are
16 cooking. There's no eating out anymore. So we can
17 order. I can make salads. It's stuff that I could cook
18 because I'm a really good cook. There's no way I can do
19 that anymore.

20 Q. Do you ever do any of the grocery shopping for
21 the household?

22 A. I will try. But if it's something light, you
23 know, if it's under like five pounds, I can do that.
24 But, no. The kids will do that. My husband will do
25 that. They try taking me. I'll go with them once in a

1 while. But it's just too much. Then my face is really
2 bad. So the sun on the face is painful.

3 Q. I think your last -- your last comments
4 regarding the sun probably gives me a pretty good idea
5 of some of the answers to next questions I'm going to
6 ask you.

7 Do you ever do any yard work?

8 A. We live in a condo. We have no yard.

9 Q. Do you have a dog?

10 A. No.

11 Q. Are you able to do any socializing?

12 A. I don't feel like socializing.

13 Q. I'm sorry. You don't --

14 A. I don't feel like socializing.

15 Q. Do you have any friends or family members
16 outside of your household that you speak to on a regular
17 basis?

18 A. I'm sorry. Can you repeat that again?

19 Q. Yeah. And just to clarify, I am not looking
20 for any names or anything like that. But just, you
21 know, aside from face to face -- Obviously, right now,
22 face to face is generally limited in the first place --
23 but, you know, if there's any family members or friends
24 that you talk to or text with or video chat with on a
25 regular basis?

1 A. I have just -- I text my mom every day. I
2 have no friends in California. People that I did
3 socialize with out here, I just kind of stay away from.
4 Just kind of, I don't want anyone to see what I look
5 like right now. I have just stayed away from everyone
6 right now. There's just too much going on.

7 Q. But even beyond staying away from people and
8 not being seen, I know you mentioned you don't really
9 have any friends in California or to the extent that you
10 do, you don't want to be seen necessarily. But are you
11 keeping in touch with people beside your mother?

12 A. I have one person that I'll maybe say hello to
13 once in a while. But that's it.

14 Q. Are you able to drive?

15 A. Yes, but not far.

16 Q. About how long can you do it?

17 A. I have been driving -- The maximum I was doing
18 without my feet getting numb was about 15 minutes.

19 Q. Are you getting any sort of exercise?

20 A. Just walking around in the house.

21 Q. Does the pain from your physical injuries
22 affect your ability to lift things?

23 A. Yes.

24 Q. Do you have any hobbies that you still engage
25 in?

1 A. We will watch a movie on TV.

2 Q. Do you have hobbies that you would normally be
3 engaging if not for your condition?

4 A. Maybe traveling would be nice.

5 Q. Not much of that happening these days.

6 A. I know.

7 Q. I know. I would like to as well. Since your
8 last move from Florida to California, I think that was,
9 what, maybe two, two-and-a-half years ago?

10 A. Two? Two years -- Yeah, you're right. A
11 little over two years, yes.

12 Q. I was just going off recollection, but --

13 A. There's the train again.

14 Q. I remember. Since you moved back to
15 California, have you made any changes in your personal
16 habits like quitting smoking, or cutting out alcohol?

17 A. I never smoked. And if I did drink, it was
18 probably a half a glass of wine. I am not a drinker.

19 Q. And more specifically, that's been consistent
20 since before the last couple of years?

21 A. I have never grown up drinking.

22 Q. When was the last time you took a vacation?

23 A. I went to see my father in February. He was
24 really ill -- of this year.

25 Q. And was that in Florida?

1 A. Yes.

2 Q. It sounds like that may not have been so much
3 of a vacation for pleasure. When was the last time you
4 took like a vacation. Nothing wrong with the answer. I
5 mean, I appreciate, you know --

6 A. That I went -- I don't want to hide anything.

7 Q. It's in no way a bad answer. But I'm just
8 trying to get an idea of, you know, the last vacation
9 for fun.

10 A. The last real vacation we went to, and it was
11 in the hardest time. But we went to -- We took a
12 two-week vacation when I first came back. And we went
13 to Europe for over two weeks.

14 Q. When you first came back --

15 A. From California. We took a long vacation to
16 Europe. In 2018, we took a nice long vacation to
17 Europe, yeah.

18 Q. That was with your husband?

19 A. Yeah, husband, family. And we took a vacation
20 and then a cruise from Spain through Italy.

21 Q. Which cruise line did you go with?

22 A. Norwegian.

23 Q. Norwegian?

24 A. Yeah.

25 Q. My girlfriend works for Viking. We went on

1 one last year in April. We were hoping to go again this
2 year because we get the employee discount.

3 A. It was beautiful.

4 Q. Well, we will get back to Europe.

5 A. It's beautiful.

6 Q. Since you stopped working at Chase -- I should
7 say, since you went off work at Chase --

8 A. Right.

9 Q. -- have you left the country?

10 A. No. Did I? I want to.

11 Q. Yeah. Is your passport still valid?

12 A. Yes. It's probably going to expire.

13 Q. I don't think there's too much of a demand for
14 the new ones right now. So it might be easy to get a
15 renewal. I just want to double check something. But I
16 believe that concludes what I have left to go over from
17 the last deposition. I just want to confirm. Okay.

18 MR. FLEISHMAN: Counsel, I have no further
19 questions. Was there anything you wanted to cover?

20 MS. FOLEY: Yeah, I have a few questions
21 related to stress and the mental condition of my client.

22

23

EXAMINATION

24 BY MS. FOLEY:

25 Q. Sandra, I want you to describe what was your

1 physical manifestation of the stress.

2 A. You mean like during work or --

3 Q. Yeah. I mean your work-related stress. How
4 did you know that you are stressed, what it is?

5 A. Like aches and pain. Trying to -- Like
6 driving home, I would be numb. I would have to pull
7 over a couple of times. I had to call for help -- That
8 was just very scary, you know -- driving on the 405.

9 There was one incident where they had to call
10 the ambulance. I called Kaiser and asked what to do.
11 And they told me to call 911. And I had to be taken via
12 ambulance away from work. And my son had to come get me
13 from Kaiser when I got discharged. That was scary. I
14 had never had that happen.

15 And then when I stopped working again, I had
16 to go back into the emergency. And they were saying it
17 was anxiety, which it took me forever to figure it out.
18 I think I was very stubborn -- was. I was so -- I put
19 in -- I was the one person that took charge of
20 everything.

21 I didn't understand what mental health meant.
22 I did it for my employees. And I wish, you know, you
23 have bosses that say, you know, "work-life balance.
24 Take time off. Get help," instead of condoning you and
25 putting you down.

1 Q. Sandra, I apologize. I have to back up
2 because it seems to me you're not responding to my
3 question.

4 A. Oh, okay.

5 Q. Let's concentrate on my questions. I am
6 asking you: If you have been stressed, how do you know
7 that you are stressed? What physical manifestations of
8 that do you experience, such as maybe a skin condition,
9 hair? I don't know. Tell me about it.

10 A. Oh, okay. My skin is broken out. I have skin
11 lacerations. I've lost half of my hair, dizzy, stomach
12 aches, which I couldn't figure out what it was.

13 I was always getting sick, constant flu's and
14 colds. And I wanted to nothing to do with my husband.
15 Loss of sex drive. The chest pains where I had to go
16 into the hospital.

17 Q. How do you know it is stress related --

18 A. Because I have --

19 Q. Hold on. Let's not talk over each other. How
20 do you know it is stress-related, in your mind? I
21 understand you're not a medical practitioner. But
22 explain to us how you learned of your mental condition.

23 A. Figured out it was stress when the chest hurt
24 so badly, I felt like it was a heart attack. That's how
25 I knew that it was stress. When I lost half of my hair,

1 like I went on Google myself and figured out it was
2 stress. I'm not a doctor. I figured out it was stress
3 myself. The pains I felt in my body. Coming home and
4 couldn't make it up the stairs, that's when I figured
5 out it was stress. The yelling and screaming, getting
6 home so tired, I figured out that was stress.

7 Q. Did you experience that before you started
8 that difficult relationship at work? Was it typical for
9 you, or it was just something new that you experienced?

10 A. Something new that I experienced. Or I was
11 sitting on a conference call, and I was being talked
12 down to, and I couldn't think anymore. I would forget
13 things. And it wasn't typical of me. And then you get
14 in more trouble. Or you're sitting in a meeting and
15 being yelled at, and your tummy is hurting more, and
16 you're pressing on it. That's stress.

17 Q. Are you saying that your memory was affected?

18 A. My memory was affected.

19 Q. How about your ability to concentrate?

20 A. I couldn't concentrate anymore. You can't
21 think anymore. For me, that was -- The more you're
22 yelled at in front of people, you can't think any more
23 what the answer is.

24 Q. What about your mood? How was it?

25 A. Very moody. And I'm not a moody person.

1 Q. Tell me, please. You've just been answering
2 the questions of defense counsel, saying that there are
3 not so many people that you're in connection with. Is
4 that typical for you, or is that related to your stress?

5 A. I am "Miss Social." I would host all the
6 parties. And people would come over to my house. And I
7 would be the one cooking for everyone. Now I don't even
8 want to see anyone.

9 So, you know, my husband has a lot of family
10 and friends out here. They would come over all the
11 time, or we would go over all the time. So I just want
12 to stay home. I don't want to see anyone.

13 Q. You are isolated?

14 A. I feel very isolated.

15 Q. Is that self-isolation or because of the
16 virus? How would you describe that?

17 A. Self-isolation.

18 Q. Why?

19 A. I just feel like a failure right now because,
20 you know, I was the one with the good career and
21 everything. And, you know, I just feel like all of that
22 is lost. Everything I tried to do is turned down.

23 Q. You mentioned that you have skin issues, hair
24 loss, weight gain. Do you feel not confident how you
25 look like?

1 A. No. It's unattractive. I used to be the
2 pretty girl that everyone looked at. And I just feel so
3 ugly and stupid. And it's embarrassing.

4 Q. You also mentioned that you lost your sex
5 drive. Is that related to your experiences with your
6 stress?

7 A. With stress. And, you know, you go to the
8 doctor, and they just give you more medicine on top of
9 medicine, I think. It just doesn't help.

10 Q. Tell us about the medicine. How many pills a
11 day do you take?

12 A. Between the vitamins -- I am just estimating.
13 Like between the vitamins and all that, about ten -- ten
14 a day.

15 Q. And what are they serving? What purpose?

16 A. Serving for a pre stroke, like a pre heart
17 attack. For the nerves, I mean, I can't repair. The
18 bones are chipped in my body. Bone lacerations, they
19 are calling it. The neck, the spacing between the neck
20 is gone. I have -- Like I am not a doctor. I keep
21 telling them I am not a doctor. But you've got like a
22 bulging disk. You've got bulging between the spine.
23 It's just -- They call it debilitation. I think, "I'm
24 only 51, and at this age, you know, I feel like a 70
25 year old." And your whole body is gone. You're not

1 living life to the full potential anymore. And it's
2 hurtful.

3 Q. Tell me about your sleep. How do you sleep?

4 A. I go lie down. I am personally lying down on
5 top of bones that hurt. So the bones are sticking out.
6 And my body -- your mind is not at rest. So you're
7 thinking of everything that is going on.

8 Q. How many hours a night can you sleep?

9 A. When I finally do fall asleep, four hours.
10 And the dreams are just horrible dreams.

11 Q. Did that start when you were still working, or
12 is it something recent?

13 A. It's been going on for probably the last two
14 years.

15 Q. So you mentioned that you are thinking about
16 something that happened. Is it racing thoughts about
17 your work experiences or something else?

18 A. Racing thoughts, work experience, how I was
19 treated, things that are, you know, the paperwork that
20 is going on. Am I going to get -- You know, it's not
21 all about the money. But it's how I was. You know, I
22 am no longer where I was in life. You know, it's the
23 future. It's the status, you know. I was always a
24 driven person. And I'm not where I was.

25 You feel humiliated. It's sad. It's just --

1 I feel driven to the ground and humiliated. And it's
2 just, you know, they talk about -- I'm a minority too.
3 And, you know, you get put down with everything. I was
4 always put down. And you go to school. And you've been
5 called -- Everyone was racist. And you've been called
6 all these colors and everything else. And that's how I
7 feel like I was put down.

8 Q. That's how you feel now?

9 A. That's how I feel now. I am going through
10 that whole cycle again. And this whole Black Lives
11 Matter, that's the parents teaching their kids that they
12 are doing that all over again.

13 And it's just so sad to see that. And that's
14 what races in my mind again. I am sorry. That's what
15 it is.

16 Q. I'm talking in regard to your work. My
17 question is related to that. So tell me, how do you
18 feel about your future? Do you feel like you have one
19 or not?

20 A. I don't have one. There's no way. You know,
21 as I mentioned in the last deposition, I only had
22 three-and-a-half years to retire. This would have been
23 my medical and everything else. It's so sad to see that
24 retirement is not going to happen. You put in all this
25 time. You do more than what's asked of a regular branch

1 manager. And it destroys your body.

2 So it's just -- it's so sad. And if you
3 mention more to the doctors or anything else, it's
4 another issue. So I don't even know what to say
5 anymore.

6 Q. I understand. Thank you.

7 MS. FOLEY: Counsel, I have no further
8 questions.

9 MR. FLEISHMAN: Okay. Well, then I propose
10 that we stipulate to relieve the court reporter of her
11 duties under the Code of Civil Procedure, Section 2025.

12 That the original and a copy of the deposition
13 transcript will be sent to applicant attorney for review
14 by the applicant of the transcript, any necessary
15 changes by the applicant, and for the applicant to sign
16 under penalty of perjury.

17 Applicant's counsel will notify me within 45
18 days of her receipt of the transcript of any changes
19 that have been made by the applicant and will forward a
20 signed copy of the transcript within 45 days of receipt.

21 And if the original is not available, a
22 certified copy can be used in lieu thereof.

23 MS. FOLEY: So stipulated.

24 (The remote deposition concluded at 11:05 a.m.)

25 ---o0o---

1 STATE OF CALIFORNIA)
) ss.
2 COUNTY OF LOS ANGELES)
3

4 I, SANDRA SEERAM, have read or had read to me
5 the foregoing remote deposition and declare under
6 penalty of perjury that my answers as indicated are true
7 and correct.

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(Date)

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(Signature)

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1 STATE OF CALIFORNIA)
) SS.
2 COUNTY OF SAN DIEGO)
3

4 I, KIMBERLY S. HANNA, CSR NO. 12230, a certified
5 shorthand reporter for the State of California, do
6 hereby certify:

7 That, prior to being examined, the witness
8 named in the foregoing remote deposition was by me duly
9 sworn to testify the truth, the whole truth, and nothing
10 but the truth;

11 That said remote deposition was taken down by me
12 in stenographic writing at the time therein named and
13 thereafter reduced to computer-aided transcription under
14 my direction;

15 That the foregoing transcript, as typed, is a
16 true and accurate record of the remote proceedings;

17 I further certify that I am not interested in
18 the event of the action.

19

20 Witness my hand this 29th day of July, 2020.

21

22

23 _____
KIMBERLY S. HANNA, CSR NO. 12230

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