

WORKERS' COMPENSATION APPEALS BOARD
OF THE STATE OF CALIFORNIA

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SZYMON JERMAKOW,)	
)	
)	
Applicant,)	
)	
vs.)	CASE NO. ADJ13487250;
)	ADJ13487287
)	
)	
PACIFIC PLASTICS, INC.)	
)	
)	
)	
)	
Defendants.)	
_____)	

DEPOSITION OF
SZYMON JERMAKOW
April 12, 2022
10:17 a.m.
Volume I

2400 East Katella
Suite 800
Anaheim, California

Diana Medina, CSR NO. 13705

APPEARANCES OF COUNSEL

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Also present:

Edward Batt, Polish Interpreter
Jandro Parducho

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DEPOSITION OF SZYMON JERMAKOW

April 12, 2022

EDWARD BATT,

was administered an oath to translate English into Polish and Polish into English the testimony of the following witness:

SZYMON JERMAKOW,

having been first duly sworn through the English-Polish interpreter, testifies as follows:

THE INTERPRETER: Registered interpreter in Polish with Judicial Council of California. Registration number 700126.

EXAMINATION

BY MR. GOLDMAN:

Q. Sir, could you please state your full name.

A. Szymon Jermakow.

Q. And could you spell that for us?

A. The first name is spelled S-z-y-m-o-n and the last name is J-e-r-m-a-k-o-w.

Q. All right. And have you ever been known by any other names?

A. No, never.

Q. My name is Mitchell Goldman, and I represent

1 Allianz Global, one of the workers' compensation insurance
2 carriers for your employer, Pacific Plastics. Also present
3 today is an attorney representative from the other insurance
4 carrier for Pacific Plastics, as well as an employer
5 representative from Pacific Plastics.

6 Have you had a chance to prepare for your
7 deposition today with your attorney?

8 A. Yes.

9 Q. And about how long did you spend preparing with
10 your attorney for the deposition?

11 A. 40 minutes.

12 MR. GOLDMAN: Is that accurate, Ms. Nadya?

13 MS. FOLEY: Yes. Natalia. And it's accurate,
14 yes.

15 BY MR. GOLDMAN:

16 Q. Okay. All right. Now I'm going to go over some of
17 the ground rules for a deposition. You've probably already
18 gone over them with your attorney, but I'm going to go over
19 them again one more time for the record.

20 A. Very well.

21 Q. Now, the oath that you just took is the same oath
22 as if you were testifying in a courtroom. The court reporter
23 is authorized by law to administer the oath, and it imposes
24 the same obligation to attempt to answer every question
25 truthfully as if you were testifying in open court. So even

1 though we're in an informal surrounding today, the testimony
2 you give has the time force and effect as if you were
3 testifying in an open courtroom. Do you understand that?

4 A. Yes.

5 Q. Because this is an oral proceeding, only one of us
6 can speak at a time. So what I'm going to do is, I'm going
7 to try to let you answer the question before I begin my next
8 question, but I'm going to need you to let me finish my
9 question before you start to answer. Do you understand
10 that?

11 A. Yes.

12 Q. Every answer also has to be in words verbally. A
13 shrug of the shoulder, a nod of the head won't come across on
14 what's called a deposition transcript. So every answer needs
15 to be in words. Do you understand that?

16 A. Yes. Very well.

17 Q. Now, what a deposition transcript is that I just
18 mentioned is a booklet that you'll get in a couple of weeks
19 or so, and it's going to have everything that's been said on
20 the record. And at some point you're going to have a chance
21 to read it and you can make any changes or corrections you
22 want. But if there are any significant changes, for
23 instance, just as an example, today -- you know, I'll stop
24 there for the interpreter.

25 For example if today I said, "Did you ever have a

1 motor vehicle accident," and you say, "Yes, I have one," and
2 then you read the transcript and you change it and you had
3 14, that could be considered a significant change and then
4 there's an issue with credibility.

5 A. I understand.

6 THE REPORTER: This is the court reporter. Can we
7 go off the record?

8 MR. GOLDMAN: Yes.

9 (Break in the proceedings.)

10 BY MR. GOLDMAN:

11 Q. Not every answer has to be perfect. There will be
12 estimates, and I'll get to that in a minute. Not every
13 answer has to be perfect, but I'll get to that in a second.
14 If I ask you a question and you don't understand it, just
15 tell me you don't understand the question and I'll try to
16 rephrase it.

17 A. Okay.

18 Q. If I ask you a question and you don't hear all of
19 it, which is possible with all this technology, just tell me
20 you didn't hear all of it and I'll try to repeat it. Do you
21 understand that?

22 A. Very well.

23 Q. Because what happens is if you answer a question
24 you don't quite understand, we're sort of still bound by the
25 answer. If I ask you a question and you don't know the

1 answer, you'll just say, "I don't know." Now, if you do
2 happen to remember the answer later in the deposition and you
3 you'd like to testify about it, that's fine. There's no
4 penalty or anything for that.

5 A. Very well.

6 Q. Now, during the course of the deposition, I may ask
7 you to estimate things; dates, monetary amounts, heights,
8 weights, distances, number of different things. And
9 estimates are fine. What we don't want are guesses. Do you
10 know the difference between a guess and an estimate?

11 A. Yes.

12 Q. Okay. If you need to take a break for any reason,
13 whether you want to speak to your attorney, want to use the
14 restroom, just tired of hearing my voice, whatever reason,
15 just let me know and we can take a short break.

16 A. Very well.

17 Q. Okay. Now, have you taken any medications in the
18 last 12 hours?

19 A. Just vitamins. That's it.

20 Q. Vitamins?

21 A. Yes.

22 Q. Okay. All right. Have you ever had your
23 deposition taken before?

24 A. No.

25 Q. And what is the date of injury or dates of injury

1 in this case you are claiming that brought you here today?

2 A. I don't remember.

3 Q. And what is your present address?

4 THE INTERPRETER: Could you repeat the question,
5 please.

6 BY MR. GOLDMAN:

7 Q. What is your present address?

8 A. In Yorba Linda.

9 Q. And do you recall the street name?

10 A. One moment. I'll look it up. 3744 Lake Crest
11 Drive, Yorba Linda. Zip code is 92886.

12 Q. And how long have you lived at that address?

13 A. 15 years.

14 Q. And who do you currently live with?

15 A. I live with a woman.

16 Q. Is this a roommate situation or a relationship
17 situation?

18 A. Let's say my girlfriend.

19 Q. And do you have -- I know the answer, but do you
20 have any children under the age of 18?

21 THE INTERPRETER: Under the age of 15?

22 MR. GOLDMAN: 18.

23 THE WITNESS: No.

24 BY MR. GOLDMAN:

25 Q. And do you have any special needs children?

1 A. No.

2 Q. And do you have a social security number?

3 A. I do.

4 Q. What is that number?

5 A. I'll give to you in a second.

6 MR. GOLDMAN: We can go off the record on this for
7 a minute.

8 (Break in the proceedings.)

9 MR. GOLDMAN: Okay. The driver's license looks
10 similar to the applicant as I view him on the screen.

11 BY MR. GOLDMAN:

12 Q. Has your license ever been suspended or revoked?

13 A. Yes.

14 Q. Was it suspended?

15 A. Yes.

16 Q. All right. How long ago?

17 A. 20 years ago.

18 Q. Do you recall what the reason was for the
19 suspension?

20 A. Too much alcohol, drunk driving.

21 Q. And how long was it suspended?

22 A. Three months.

23 Q. Have you ever been a member of any military?

24 A. In Poland.

25 Q. And what branch of the service did you serve in

1 Poland?

2 A. Enter aircraft artillery.

3 Q. And do you receive any sort of military pension
4 from the Polish government?

5 A. No.

6 MR. GOLDMAN: Is the answer no?

7 THE INTERPRETER: The answer is "no," yes.

8 BY MR. GOLDMAN:

9 Q. And did you happen to suffer any injuries while you
10 were in the military?

11 A. No.

12 Q. And have you ever been convicted of a felony?

13 A. No.

14 Q. And besides this claim, have you made any claims or
15 any other type of injury, like an automobile accident or a
16 slip-and-fall or something where an insurance claim had to be
17 filed?

18 A. No.

19 Q. And since the date of injury -- the last date that
20 I have here is March 15th, 2020 -- have you left the state of
21 California?

22 A. Yes, I did.

23 Q. And when was the most recent time you left the
24 state of California since March 15th, 2020?

25 A. It was last year.

1 Q. And when about last year? I don't need the exact
2 dates, but the month would be great.

3 A. I left in April and I came back in September.

4 Q. And where did you go?

5 A. To Poland.

6 Q. And have you been anywhere else since March 15th,
7 2020 out of state besides the trip last year to Poland?

8 A. No.

9 Q. What is your highest level of education?

10 A. I went to mechanical school, technician.

11 Q. And when did you go there?

12 A. When did I finish the school?

13 Q. Yes.

14 A. I finished in 1959.

15 Q. All right. Was that in the United States or in
16 Poland or another country?

17 A. In Poland.

18 Q. All right. Since the date of injury -- we're
19 choosing the date as March 15th, 2020 -- have you applied for
20 any social security benefits?

21 Let me back up for a second.

22 Have you applied for any state disability benefits?

23 We'll get to social security in a second.

24 A. No.

25 Q. Have you applied for any social security

1 benefits?

2 A. Well, last year was unemployment.

3 Q. All right. Last year, 2021, you got unemployment
4 benefits from the State?

5 A. So from March 15th I was getting unemployment, I
6 think, maybe for one year.

7 Q. So from March 2020 to March 2021, you were getting
8 unemployment benefits; is that correct?

9 A. Yes.

10 Q. And did you apply for state disability benefits at
11 that time or just the unemployment benefits?

12 A. It was related to COVID-19. It was just
13 unemployment. That's all.

14 Q. When you had the benefits for unemployment during
15 that year -- I understand that there was the COVID
16 situation -- do you know if they -- for these benefits, if
17 they wanted to know if you could -- if you had the ability to
18 return to some form of work?

19 A. Yes, I was ready to return to work after COVID.

20 Q. Okay. Now, at the time that you stopped working,
21 were you already receiving social security benefits?

22 A. Yes.

23 Q. I jumped ahead of myself.

24 Okay. The social security benefits that you had
25 been receiving, did they change at all after you stopped

1 working or were they the same benefits that you had before
2 you stopped working? I'll just ask that.

3 A. No.

4 Q. No, they didn't change?

5 A. No.

6 Q. All right. And these were what I'll call the
7 regular social security benefits, the ones that everybody
8 generally gets when they reach 65 or so?

9 A. Yes.

10 Q. And at the time that you stopped working, did you
11 have any private medical insurance?

12 A. I had.

13 Q. All right. And who did you have that -- what
14 insurance company provided the private health insurance?

15 A. I don't remember how it's called.

16 Q. Do you have a card or an app even from the
17 insurance?

18 A. Well, now I have retirement insurance.

19 Q. We'll get to that in a second.

20 Okay. You did have private insurance. You're not
21 sure who it was with; right?

22 A. Now I have what's called Skin Insurance now.

23 Q. Skin Insurance?

24 THE INTERPRETER: Yeah, it's called Skin.

25 ///

1 BY MR. GOLDMAN:

2 Q. Could I get a spelling?

3 THE INTERPRETER: Oh, it's called Scan Insurance,
4 S-c-a-n.

5 BY MR. GOLDMAN:

6 Q. Is this part of -- are you getting Medicare
7 benefits now?

8 A. No.

9 Q. You're not getting government health insurance
10 now?

11 A. No.

12 Q. Do you have a card for this Scan Insurance?

13 A. Yes.

14 Q. Could you hold that up to the screen.

15 MR. GOLDMAN: Is there a way I can get a copy of
16 that?

17 MS. FOLEY: Counsel, I think I can take a picture
18 of that and then mail it to you. Will that work for you?

19 MR. GOLDMAN: That will be fine.

20 MS. FOLEY: Okay.

21 THE INTERPRETER: He just says that on the other
22 side of the card is his Medicare number.

23 MS. FOLEY: So you have Medicare?

24 THE WITNESS: Yes.

25 MR. GOLDMAN: That's what I thought, but okay.

1 BY MR. GOLDMAN:

2 Q. Do you have any life insurance?

3 A. I don't have.

4 MS. FOLEY: Counsel, can you give me your e-mail
5 address, please?

6 MR. GOLDMAN: Can we go off the record for a
7 second.

8 (Break in the proceedings.)

9 MR. GOLDMAN: We can go back on the record.

10 MS. FOLEY: Okay.

11 BY MR. GOLDMAN:

12 Q. When you received the unemployment benefits, about
13 how much did you receive per week or every two weeks or
14 however you want to break it down?

15 A. It came every two weeks. It was 450 per week.

16 Q. Okay. And how much are you getting per month for
17 social security?

18 THE INTERPRETER: I'm sorry?

19 BY MR. GOLDMAN:

20 Q. How much do you get from social security? I know
21 they do it per month, so if you want to tell me per month,
22 that's fine too.

23 A. 2,660.

24 Q. All right. Are you currently receiving the social
25 security benefits?

1 A. Yes.

2 Q. And so you receive income or monetary -- do you
3 receive income from any other source besides social
4 security?

5 A. Yes, I have a pension.

6 Q. And where is the pension from?

7 A. Omaha Insurance. This company is paying.

8 Q. Is this through your work at Pacific Plastics?

9 A. Yes.

10 Q. And how much is the pension per month or however
11 you receive it?

12 A. \$1,171.

13 Q. This is per month?

14 A. Yes.

15 Q. Now, when was the last day that you worked at
16 Pacific Plastics?

17 A. When did I get the last check?

18 Q. That's fine, yes.

19 A. 15th of July 2020.

20 Q. All right. And were you working for Pacific
21 Plastics in July of 2020?

22 A. Well, at that time I was already on unemployment,
23 so I didn't work. On the 15th of July I got my last check
24 from my vacation.

25 Q. Okay. When was the last month that you recall that

1 you worked for Pacific Plastics in 2020?

2 A. Before 15th of March, 2020.

3 Q. All right. And why did you stop working at that
4 time?

5 A. Because the government said that when you're over
6 60 years, you go home because of COVID.

7 Q. Did anyone at Pacific Plastics tell you you had to
8 stop working there?

9 A. Yes.

10 Q. And why did they tell you you had to stop working
11 there?

12 A. They said that everybody who's over 60 years old
13 has to go home for COVID test. My supervisor -- he was the
14 manager -- that's what he said.

15 Q. And was there ever a time that they said that you
16 could come back to work?

17 A. There was a time I came back and they said only
18 Monday and Thursday, four hours each day. That's all. It
19 was discrimination.

20 Q. And when was this about that they said you can come
21 back and do this part-time work? I don't need the exact
22 date, but roughly.

23 A. It was towards the end of April, before May 1st.

24 Q. Of 2020?

25 A. Yes.

1 Q. Okay. And did you return to work on that part-time
2 basis?

3 A. No, because I felt I was being discriminated
4 against because I was old.

5 Q. Did they tell you why the return was only
6 part-time?

7 A. No.

8 Q. Did you ask?

9 A. I asked.

10 Q. And what was their response when you asked?

11 A. They said they have a replacement for me and the
12 old people should be at home.

13 Q. Have you filed an age discrimination lawsuit?

14 A. No, I did not file a suit, but I felt that I was
15 discriminated against.

16 Q. All right. And at some point the pension -- let me
17 back up.

18 The pension that you spoke about a few minutes ago,
19 when did you start to receive the pension?

20 A. You mean unemployment?

21 Q. No. The pension from Pacific Plastics, the \$1,171
22 a month, when did you start to receive that?

23 A. When I finished 70 years, then I started to get
24 it.

25 Q. All right. So you've been getting it while you

1 were working there?

2 A. Yes, because I worked until the age of 80.

3 Q. All right. Okay. When you stopped working at
4 Pacific Plastics in March of 2020, how much did you make at
5 that job before taxes per week or however you want to do
6 it?

7 A. I used to make \$1,200 a week.

8 Q. All right. And how many hours a week did you
9 work?

10 A. There was no limit. You worked 12, 14 hours. I
11 did maintenance.

12 Q. Okay. Would you say from 2020, those two and a
13 half months, would you say you worked more than 40 hours a
14 week?

15 A. Yes.

16 Q. More than 50?

17 A. Yeah. Between 40 and 50 hours sometimes.

18 Q. Okay. Was there any overtime?

19 A. Yes.

20 Q. And how many days a week did you work?

21 A. Five, sometimes six days a week.

22 Q. And were they set hours, you know, during the
23 course of a day or did the hours vary?

24 A. Usually I worked from 6:00 to 6:00, but sometimes
25 it was a little less, sometimes it was more.

1 Q. 6:00 a.m. to 6:00 p.m.?

2 A. Yes.

3 Q. Before March of 2020, did you ever apply for any
4 type of workers' compensation benefits?

5 A. No, no.

6 Q. And are you currently employed?

7 A. No.

8 Q. And when did you start to work for Pacific
9 Plastics?

10 A. On the 15th of July 1985.

11 Q. And just briefly, what was your place of birth?

12 THE INTERPRETER: Sorry, could you repeat?

13 BY MR. GOLDMAN:

14 Q. What was your place of birth?

15 A. In Poland.

16 Q. And when did you first come to the United States?

17 A. In January of 1980.

18 Q. Okay. During the time that you worked for Pacific
19 Plastics, which is 35 years, do you recall if there were any
20 significant breaks in the employment during that time, say,
21 more than two weeks for any reason?

22 A. Only when I took vacation time and went to Poland.
23 One month. No more.

24 Q. When you stopped working for Pacific Plastics in
25 2020, what was your job title?

1 THE INTERPRETER: What was the job title?

2 MR. GOLDMAN: Yes.

3 THE WITNESS: I was maintenance mechanic and
4 machinist.

5 BY MR. GOLDMAN:

6 Q. And when you first started at Pacific Plastics in
7 1985, what was your job title?

8 A. Maintenance mechanic and I also did work of
9 machinist as well. I did the same job for 35 years.

10 Q. Okay. At any time in those 35 years, were you ever
11 in a supervisory capacity of other workers?

12 A. Well, you know, there was a supervisor, but I was a
13 mechanic. I essentially did everything.

14 Q. My only question was: Did you supervise any other
15 employees during those 35 years?

16 A. I had two mechanic helpers.

17 Q. All right. And how long did you supervise the
18 helpers -- let me rephrase that.

19 When you first started there in 1985, did you have
20 helpers?

21 A. No, I was alone.

22 Q. And when approximately were you first given a
23 helper?

24 A. After two or three years.

25 Q. So since about 1988 or so to 2020, you always had

1 at least one helper, maybe two; is that correct?

2 A. Yes, sometimes two.

3 Q. Now, even though you had the same job title in the
4 35 years, did the technology for the equipment you worked
5 with, I should say, change in those 35 years in any way?

6 A. Yes.

7 Q. And let's just say from, say, 2015 to 2020, was the
8 equipment essentially the same during those last five
9 years?

10 A. For ten years it was pretty much the same and every
11 year there was some kind of a new change; more machines, more
12 equipment.

13 Q. Okay. Well, what I'd like to do is just sort of go
14 through -- you know what, let's just do -- when you started
15 in 1985, what type of equipment did you use?

16 A. It was a very primitive equipment. Just basic
17 tools, basic hammer. All the machines there were very old.

18 Q. And then over time, over the 35 years, did they
19 update the equipment?

20 A. Yes, they did. New machines, new technology.

21 Q. And you're saying the last ten years the equipment
22 was essentially the same although there might have been some
23 additions but not major additions. Is that a correct
24 statement?

25 A. There were changes.

1 Q. What I'd like to do is just maybe go over -- go
2 back about the last year or so you worked, and what I want to
3 do is I want to sort of go through a typical day of work.
4 Basically you arrive at the location -- did you work at just
5 one location in the last year that you worked?

6 A. Yes, same location.

7 Q. And you would arrive at that location about 6:00
8 a.m.; is that correct?

9 A. Yes.

10 Q. And what was the first thing you did when you
11 arrived?

12 A. So when I arrived, the foreman gave a report on
13 what's broken, what needs to be done, what are the
14 problems.

15 Q. And what types of -- could you give me an example
16 of what would be broken?

17 A. So this work -- this facility worked all night
18 long, three shifts, and worked Saturday, Sunday, no break.

19 Q. Okay. And if you recall, was there any types of
20 equipment that maybe that you at least thought broke down or
21 needed repaired more often than others?

22 A. Yes.

23 Q. And what was the most, let's say, troublesome piece
24 of equipment? What was it called?

25 A. Mold rebuild.

1 MR. GOLDMAN: A what rebuild?

2 THE INTERPRETER: Molt, I guess it's spelled,
3 m-o-l-t?

4 BY MR. GOLDMAN:

5 Q. Would you have to repair the mold rebuild machines,
6 say, at least once a week?

7 A. More often. There were several of those over
8 there.

9 Q. All right. And would the breakdowns on the mold
10 rebuild machine, would it be the same reason or were there
11 different reasons?

12 A. It's a machine, so there were different reasons.

13 Q. What was one of the reasons that the mold rebuild
14 machine will break down?

15 A. Maybe too much pressure, maybe something broke
16 down. And sometimes there was no electricity and plastic
17 will get solid or something like that.

18 Q. And tell me, you can give me as much detail as you
19 want, how would you fix it if plastic would get stuck and
20 electricity will go off? Tell me how would you fix that.

21 A. You had to take it apart. You have to clean it
22 after plastic completely. Then you would have to see what
23 was going on, either change the part or fix the part.

24 Q. How would you -- how big is the machine?

25 A. It depends on mold. There was some heavy elements

1 and you had to take it off with your hands. You have to lift
2 it up. Then you had to call some additional people to help
3 you. You have to clean it, take it apart, and put it back
4 together.

5 Q. And how would you take it apart? What tools would
6 you use and how would you do it?

7 A. You had these big tools that you had to use.

8 Q. And what were -- did they have any names or was it
9 hammers, screw drivers?

10 A. There are some different sockets.

11 Q. So you would take a socket and what would you do --

12 A. There's a crest wrench.

13 Q. What would you do with those tools? How would you
14 take the machine apart?

15 A. It depends whether you have to unscrew it, you have
16 to sometimes take the gear box out. It depends on that.

17 Q. Okay. All right. And what else would you have to
18 take out besides the gear box?

19 A. Those rollers that push this plastic, for instance.
20 And of course there are some pumps that are connected to this
21 machine, also you have to disconnect these too.

22 Q. Now, the past you just explained, did you do this
23 by yourself or did you do this with your helpers?

24 A. No, you can't do it by yourself. You have to call
25 a mechanic and other people to help you.

1 Q. So how many people would take this machine apart?

2 A. The smallest job required three people. And when
3 it's a big machine, you had to also use a forklift and more
4 people.

5 Q. All right. So the mold rebuild machines, were they
6 different sizes?

7 A. Yes, because some pipes were from half an inch to
8 20 inch.

9 Q. And when the mold rebuild machines were being taken
10 apart, you weren't the only one taking them apart. Were you
11 one of the people taking them apart or did you just supervise
12 the helpers taking it apart?

13 A. Sometimes either myself or other people did this.

14 Q. And how often -- how long would it take generally
15 to take apart the mold rebuild machine?

16 THE INTERPRETER: How often?

17 MR. GOLDMAN: How long.

18 THE WITNESS: The smallest size mold, it took eight
19 hours, and the big ones, sometimes it took two days.

20 BY MR. GOLDMAN:

21 Q. So when you were fixing the mold rebuild machine or
22 repairing it, it would be more than a one day -- it would
23 take either all day for one or sometimes more than one day?

24 A. More.

25 Q. Okay. And so just taking apart could take a day;

1 correct?

2 A. Yes.

3 Q. So you spend a day taking the mold rebuild machine
4 apart, come back the next day. What do you do with it?

5 A. So you know, when you take it apart, you have to
6 clean it completely. You have to polish it. And sometimes
7 it took even two days just to put it back together.
8 Sometimes it took 14 or 15 hours to finish the job.

9 Q. And when you clean the parts, did you just do the
10 cleaning or were there multiple people doing the cleaning?

11 A. No, there were other people also because it's a big
12 job.

13 MR. GOLDMAN: Can we go off the record for a second
14 and take a quick break?

15 MS. FOLEY: Sure.

16 (Break in the proceedings.)

17 MR. GOLDMAN: Back on the record.

18 BY MR. GOLDMAN:

19 Q. In addition to the repairing of the mold rebuild
20 units or machines, what were the other -- were there any
21 other major assignments you would get on a consistent
22 basis?

23 A. Yes. I worked on a lathe machine, sometimes
24 parts.

25 Q. Let's start with the lathe machine. What would you

1 do with the lathe machine?

2 A. This lathe machine, size you make to form a pipe.

3 THE INTERPRETER: These are technical things that
4 interpreter is not familiar with.

5 THE WITNESS: Belling pipe.

6 BY MR. GOLDMAN:

7 Q. And what were some of the other things that you
8 mentioned? Something about parts. Did you make parts?

9 A. Yeah, the shafts and those rollers and couplings.

10 Q. Shafts, rollers, and couplings?

11 A. Yes.

12 Q. What would you do with the shafts?

13 A. There were hundreds of those shafts. Sometimes you
14 have to make coupling for a shaft that is four inch,
15 sometimes two inch, three inch.

16 Q. Let me just jump ahead here. In the 35 years that
17 you worked at Pacific Plastics, you said that the technology
18 changed, but did the work -- in your opinion, was the work --
19 did the work get easier or harder?

20 A. Well, yes, it was a little easier, but you had to
21 work also hard.

22 Q. Would I be correct saying that the work might have
23 gotten a little easier, but the technology might have made
24 things more complicated?

25 A. Exactly. That's right.

1 Q. Okay. All right. Who was your last supervisor at
2 Pacific Plastics?

3 A. Well, I was replaced by that person, but I don't
4 remember his name.

5 Q. All right. The last supervisor that you had, how
6 long was that person your supervisor?

7 A. So he was about a year before I left.

8 Q. Okay. Do you remember the names of any of your
9 more recent supervisors?

10 A. Jose Varerra.

11 Q. Jose Varerra?

12 THE INTERPRETER: I think so.

13 THE WITNESS: So the supervisor, maintenance
14 mechanic, I was the one. Then I had helpers/mechanics.

15 BY MR. GOLDMAN:

16 Q. Okay. Was Jose Varerra your supervisor?

17 A. There was a lot of turnover. He was working as a
18 mechanic. Then he moved to quality control.

19 Q. Okay. When you were working for Pacific Plastics
20 at any time in those 35 years, did you have a second job, a
21 side job of any kind?

22 A. No, only I worked at Pacific Plastics because I put
23 in a lot of overtime there and was just one job.

24 Q. And were you ever self-employed during that time?
25 Did you ever have your own business of any kind in those 35

1 years?

2 A. No.

3 Q. Now, in those -- in the year that you were getting
4 unemployment benefits, March of 2020 to March of 2021, did
5 you look for any type of work during that time?

6 A. I did not work. I didn't work anywhere.

7 Q. But I'm saying, did you look for any work while you
8 were getting unemployment?

9 A. No.

10 Q. Why not?

11 A. Because I wanted to retire already.

12 Q. All right. What I like to do is -- there are a
13 number of potential injuries here that you've alleged in your
14 three applications.

15 I'll stop there for the interpreter.

16 A. I said yes.

17 Q. The one that I'd like to at least focus on at least
18 to start for today is the one dealing with your orthopedic
19 injuries, your body and bone. And I guess, officially the
20 date on the application is January 1st, 2010 to March 15th,
21 2020, but I want to sort of talk about what hurts in your
22 body orthopaedically. So as of now as we're sitting here
23 now, what hurts?

24 A. Lower back hurts, legs. I can't walk.

25 Q. The lower back and you were saying both legs?

1 A. Yes.

2 Q. Now, is the problem with your legs because of
3 sensations coming from the lower back? Is that why you're
4 having problems walking?

5 MS. FOLEY: Objection. Calls for a medical
6 opinion.

7 MR. GOLDMAN: Just how he feels.

8 MS. FOLEY: He cannot testify to the causation. He
9 can explain how he feels, but saying that it's because of
10 this or that, this is medical opinion and he doesn't have
11 medical degree, so ask in the way that you want.

12 BY MR. GOLDMAN:

13 Q. Okay. Why can't you walk?

14 A. My legs hurt.

15 Q. What else?

16 A. Right arm, shoulders.

17 Q. What else?

18 A. Well, also, you know, the lungs hurt inside.

19 MS. FOLEY: We're talking about the orthopedic.

20 BY MR. GOLDMAN:

21 Q. The body parts, the orthopedic, I have your right
22 shoulder, right arm, your back, and your legs. Is that where
23 we are? Anything else?

24 A. I can't move my head. The top of my head hurts.

25 Q. Okay. Now, when did you first start to experience

1 symptoms in your lower back?

2 A. Ten years.

3 Q. So about 2010; correct?

4 A. Yes.

5 Q. What were (inaudible) --

6 THE INTERPRETER: I'm sorry. I didn't understand.

7 Could you repeat, please.

8 BY MR. GOLDMAN:

9 Q. What symptoms did you experience to your lower back
10 in 2010?

11 A. So I started to feel pain and from that my legs
12 started to feel numb.

13 Q. And did you tell anybody at work in 2010 that you
14 had this pain and numbness?

15 A. Yes. The mechanics that worked with me, they knew
16 about it. I also complained to the manager at work.

17 Q. All right. You told the manager in about 2010 that
18 you were having this pain and numbness situation; is that
19 correct?

20 A. Yes.

21 Q. All right. Do you recall the name of the
22 manager?

23 A. I don't remember. They were changing there
24 frequently.

25 Q. Let's start, the first manager you told that you

1 recall, do you remember what they told you when you told them
2 about your symptoms?

3 A. He said that, "It will go away. You just have to
4 relax a little bit," but he didn't say you have to go to the
5 doctor.

6 Q. All right. And in the years between 2010 and 2020,
7 did you tell any other managers?

8 A. Yes, I told them that I had pain.

9 Q. And about how many managers did you tell in those
10 ten years, give or take?

11 A. So first there were the first three managers, as I
12 said. And then I worked on the machine that I wouldn't do
13 the mold.

14 MR. GOLDMAN: Could you repeat that last answer.

15 THE INTERPRETER: He said he told three managers.

16 BY MR. GOLDMAN:

17 Q. Okay. And then what did you say after that?

18 A. And then they said, "You work on the machine shop,
19 so it would be a little easier so you don't have to walk as
20 much."

21 Q. And when approximately did they move you to the
22 machine shop?

23 A. Yeah, they moved me for a while, but when job
24 required to do this mold machine, that's when I went back and
25 did the mold machine.

1 Q. My question was: About when? About what year
2 between 2010 to 2020 did they move you to the machine shop?

3 A. I don't remember.

4 Q. Was this before or after 2015? Do you know that?

5 A. I don't remember.

6 Q. All right. Now, during this time, this last ten
7 years, did you have private -- did you have any private
8 medical insurance from 2010 to 2020?

9 A. I did.

10 Q. Okay. And did you -- was it Medicare? Because
11 even at that point, 2020, I think you were eligible for
12 Medicare. Was it Medicare or was it a private medical
13 insurance company?

14 A. It might have been from Pacific Plastic insurance,
15 and I also had supplemental private insurance.

16 Q. Whatever type of private insurance you had or
17 medical insurance you had of any kind, did you see a medical
18 professional in 2010 on your own for the symptoms you were
19 having in the back and legs?

20 A. No, I did not go.

21 Q. Why not?

22 A. Because, you know, sometimes it hurts; sometimes it
23 didn't. I just went to work. I did the job.

24 Q. Did you do any self-treatment, take any
25 over-the-counter medications?

1 A. No.

2 Q. Now, over time, between 2010 to 2020, did the
3 symptoms -- the symptoms decrease at all?

4 THE INTERPRETER: If they decreased?

5 MR. GOLDMAN: Yes, decrease, lessen.

6 THE WITNESS: It got worse.

7 BY MR. GOLDMAN:

8 Q. And so in those ten years even though the symptoms
9 got worse, you never sought any private medical treatment?

10 A. I just took different pill, painkiller pills.

11 Q. Okay. So you did take over-the-counter
12 medications?

13 A. Yes.

14 Q. And since you stopped working, have you sought any
15 medical treatment for the low back and leg symptoms?

16 A. Yes, I went to a private doctor.

17 Q. And who was the private doctor that you saw after
18 you stopped working at Pacific Plastics?

19 A. It's my private doctor.

20 Q. And who is that?

21 A. In Orange County, Thomas Hryniewicki.

22 Q. Could you spell the last name?

23 A. So the first name was Thomas, T-o-m-a-s-z (sic).

24 Last name is spelled H-r-y-n-i-w-i-e-z-k-i. Maybe I have a
25 business card.

1 Q. And where is he located?

2 A. In Orange.

3 Q. And how long was Dr. Thomas your regular private
4 doctor?

5 A. More than ten years.

6 Q. Did you see -- so he was your doctor -- your
7 private doctor since at least 2010?

8 THE INTERPRETER: One more time, please.

9 BY MR. GOLDMAN:

10 Q. He was your private doctor since at least 2010?

11 A. Maybe 2015.

12 Q. Okay. And did you see him for any reason from 2015
13 to March of 2020?

14 A. Yes.

15 Q. And do you remember any of the reasons you went to
16 see him between 2015 and 2020?

17 A. Yeah, I went to him for my lower back. They sent
18 me for some X-rays.

19 Q. All right. So you did seek private treatment for
20 the back injuries from 2010 to 2020. You did tell Dr. Thomas
21 about your back condition; is that correct?

22 A. Yes. He even referred me to some rehabilitation,
23 some exercises.

24 Q. So he referred you for X-rays; is that correct?

25 A. Yes, and they also did MRIs.

1 Q. At the physical therapy; is that correct?

2 A. It didn't help.

3 Q. All right. Okay. Do you remember where Dr. Thomas
4 sent you for physical therapy?

5 A. It was also located in Orange.

6 Q. And do you remember where Dr. Thomas may have
7 referred you for the MRIs?

8 A. I think they did it in Tustin, in a hospital
9 there.

10 Q. All right. And when you went to see Dr. Thomas for
11 your back, was there any -- did you tell him or did he tell
12 you or was there a discussion of that -- the condition could
13 have been due to your work activities?

14 A. I don't remember.

15 Q. At that time, so in 2015, did you think -- or as
16 far as you were concerned that the conditions in your back
17 and legs might have been due to your work conditions?

18 A. Yes.

19 Q. And is there a reason why you wouldn't have told
20 that to Dr. Thomas?

21 THE INTERPRETER: One more time, please.

22 BY MR. GOLDMAN:

23 Q. Is there a reason why you wouldn't have told that
24 to Dr. Thomas?

25 A. I don't remember.

1 Q. Well, you don't remember why you wouldn't have told
2 Dr. Thomas that you thought that the back and leg conditions
3 were due to work?

4 A. Well, we were talking and he always asked where do
5 I work and I told him where I worked.

6 Q. And Dr. Thomas never said that this could be a work
7 injury and maybe it should be treated through the company's
8 workers' compensation system?

9 A. Well, I told him what kind of work I do. It's a
10 tough job, heavy work, and I would work with those mold
11 machines and that's how it was. He gave me some tablets to
12 drink and that was it.

13 Q. And since you stopped working, have you seen
14 Dr. Thomas?

15 A. Every six months I visit him.

16 Q. And did you tell him about the symptoms in your
17 back and legs? Is that correct?

18 A. Yes, I was there last time in January. I told him,
19 yes.

20 Q. And have you told him about the workers'
21 compensation claim for your back and legs?

22 A. Yes, I told him.

23 MS. JENG: Can I just clarify whether this
24 Dr. Thomas, is he located on Chapman?

25 THE WITNESS: Yes.

1 MS. JENG: Okay. Is it Dr. Thomas, T-h-o-m-a-s,
2 Hryniewicki, H-r-y-n-i-e-w-i-c-k-i.

3 THE WITNESS: Yes, that's the spelling.

4 MS. JENG: Thank you.

5 BY MR. GOLDMAN:

6 Q. And Dr. Thomas, he continues to treat you after you
7 explained about the workers' compensation claim?

8 A. Yes. He is prescribing these pills, these
9 medications for me.

10 Q. All right. And is that all that Dr. Thomas is
11 doing -- is Dr. Thomas just prescribing the medications or is
12 there something else that he's doing?

13 A. Yes, he does. He's giving -- I have a list here of
14 medications that he also is giving me.

15 Q. Okay. About how many medications?

16 A. I have here a list. It looks like at least four --
17 it's six medications, looks like.

18 Q. And you don't have to tell me what the medications
19 are called because that will take case -- do you know what
20 the medications are for?

21 A. For the bones, for my stomach and lungs and for
22 kidney.

23 Q. And how long are you supposed to take these
24 medications?

25 A. So I'm taking these medications at least three or

1 five years now and I continue to take them.

2 Q. How often do you take them now? Do you take them
3 every day, two times a week, how often?

4 A. Every day. Some of them every day; some of them
5 every other day.

6 Q. Okay. And have you taken any of these medications
7 today?

8 A. No. Yesterday and day before I did.

9 Q. Okay. Are you waiting -- are you supposed to take
10 medication sometime today, some of these medications?

11 A. When I go back home, I'll take it.

12 Q. And are any of these medications, are they for the
13 back and leg situation, the symptoms?

14 A. Yes.

15 Q. All right. What are those medications supposed to
16 do?

17 A. It helps my bones, my legs.

18 Q. How does it help?

19 A. So you don't feel the pain for a day or two and
20 then later it starts again.

21 Q. Okay. For your back and your legs, have you
22 gotten -- when I use the term "medical treatment," that means
23 anything to do with a medical professional. You can just --
24 it's a very wide definition. So for your back and legs, have
25 you received medical treatment anywhere else besides

1 Dr. Thomas?

2 A. No.

3 MS. FOLEY: Dr. Gofnung didn't provide you
4 anything?

5 THE WITNESS: I'm sorry. Yes, Dr. Gofnung provided
6 treatment. Yes, there was another doctor named Petruska
7 (phonetic).

8 BY MR. GOLDMAN:

9 Q. Let's just start with Dr. Gofnung. Do you know
10 what kind of doctor Dr. Gofnung is?

11 A. He's a chiropractor.

12 Q. And when approximately were you first seen at
13 Dr. Gofnung's office?

14 A. Maybe a year ago. Maybe more. Maybe April or May
15 in 2020.

16 Q. And who referred you to Dr. Gofnung?

17 A. Natalia recommended him.

18 Q. So it was your attorney that referred you to
19 Dr. Gofnung?

20 A. Yes.

21 MS. FOLEY: Counsel, I apologize. Can I give you
22 the spelling of the last name of the doctor?

23 MR. GOLDMAN: Go ahead.

24 MS. FOLEY: It's G-o-f-n-u-n-g, Gofnung.

25 ///

1 BY MR. GOLDMAN:

2 Q. Did Dr. Thomas know that you were going to
3 Dr. Gofnung?

4 A. Yes.

5 Q. And how often since April of 2020 have you seen
6 Dr. Gofnung?

7 A. Usually twice a week; sometimes once a week.

8 Q. And this is -- when was the last time you saw him
9 roughly?

10 A. I think I was there last year. I think in April
11 before my trip to Poland.

12 Q. Okay. And have you seen him since you returned
13 from Poland?

14 A. No, I just came back to visit Dr. Thomas.

15 Q. Okay. When you saw Dr. Gofnung, what type of
16 treatments did you receive with him?

17 A. He was doing physical therapy. He didn't give any
18 medication.

19 Q. Okay. Good for him.

20 What type of physical therapy did he give you?

21 A. He put me on a bed and he basically checked my
22 bones and everything. He did the massage.

23 Q. Okay. Anything else besides massage?

24 A. I did some exercises on those bikes.

25 MR. GOLDMAN: Exercises on what?

1 THE INTERPRETER: Bicycles.

2 BY MR. GOLDMAN:

3 Q. Okay. Anything else besides massages and the
4 bicycle?

5 A. Massage and the bicycle and that's it.

6 Q. And was it helpful at all?

7 A. Temporary.

8 Q. How temporary?

9 A. Maybe for a day or two there was no pain.

10 Q. And when the pain returned, was there less pain or
11 did it return to the same level of pain that it was before
12 that particular session of massage and bicycles?

13 A. It came back, the pain, exactly as it was before
14 the treatment.

15 MS. FOLEY: Counsel, I just want to let you know
16 that I have other arrangements for today after 1:00 p.m., so
17 I'm wondering --

18 MR. GOLDMAN: Can we go off the record?

19 MS. FOLEY: Yeah. Sure.

20 (Break in the proceedings.)

21 MR. GOLDMAN: So what I'd like to propose due to
22 time constraints and other issues, I'd like to stop the
23 deposition now and continue it to a Part II and also -- I'd
24 like to propose that as a stipulation along with we relieve
25 the court reporter of her current duties, but that you

1 still -- her duties will still include creating a deposition
2 transcript with the original deposition transcript going to
3 the office of the applicant attorney. And that within 45
4 days of applicant attorney's office receiving the deposition
5 transcript that they -- I guess actually we'll make it 60
6 days -- actually make it 90 days from the date of the receipt
7 by their attorney to review, sign, and correct the deposition
8 transcript, and then have it to my office within 30 days with
9 any changes or corrections by the applicant and provide us
10 with a copy and signature page. Applicant attorney will
11 retain custody of the original deposition transcript and
12 produce it upon reasonable demand, but if the original is
13 unavailable for any reason, an unsigned certified copy can be
14 used in its place for all purposes.

15 MS. JENG: So stipulated.

16 MS. FOLEY: So stipulated.

17 (Deposition proceeding concluded at 12:42 p.m.)

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REPORTER'S CERTIFICATION

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I, DIANA MEDINA, a Certified Shorthand Reporter
in and for the State of California, do hereby certify:

That the foregoing witness was by me duly sworn;
that the deposition was then taken before me at the time
and place herein set forth; that the testimony and
proceedings were reported stenographically by me and later
transcribed into typewriting under my direction; that the
foregoing is a true record of the testimony and proceedings
taken at that time.

IN WITNESS WHEREOF, I have subscribed my name
this 12th day of April 2022

Diana Medina

Diana Medina, CSR NO. 13705.

CERTIFICATE OF READER-INTERPRETER

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I, _____,
whose address is _____,
a person who speaks the language of the deponent;
namely Polish, do hereby certify that on the
_____ day of _____, 20_____,
I did translate the foregoing deposition from the English
language into the Polish language, reading same to the
deponent in his/her native tongue, to the best of my
ability;

That all corrections and changes requested by
the deponent were made and initialed by the deponent;

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

READER-INTERPRETER

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Our Assignment No. 810708

Case Caption: Szymon Jermakow vs. Pacific Plastics, Inc.

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the above captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the _____ day of _____,

20_____,

SZYMON JERMAKOW

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