

1 **ALBERT AND MACKENZIE**  
2 Limited Liability Partnership  
3 Arian Khodakarami, Bar No.: 316929  
4 28216 Dorothy Drive, Suite 200  
5 Agoura Hills, CA 91301  
6 (562) 285-5000  
7 UAN: ALBERT MACKENZIE LONG BEACH  
8 ERN: 12172048  
9 AKhodakarami@albmac.com

10 Attorneys for Defendant(s)

11 **WORKERS' COMPENSATION APPEALS BOARD**

12 **STATE OF CALIFORNIA**

13 **JAVIER VALDIVIA**

14 Applicant,

15 vs.

16 **MC CULLAH CONSTRUCTION**  
17 **COMPANY, INC.;**

18 Defendant(s).

19 **WCAB CASE NO.: ADJ9571493,**  
20 **ADJ9571493**

21 **OBJECTION TO DECLARATION OF**  
22 **READINESS TO PROCEED**

23 **MSC**

24 **Date: March 28, 2024**

25 **Time: 8:30 A.M.**

26 **Location: WCAB – Los Angeles**

27 **Judge: Andrew Malagon**

28 COMES NOW, Defendant, Mc Cullah Construction Company, Inc./, by and through their  
attorneys of record, Albert and Mackenzie, and hereby objects to applicant's attorney's  
Declaration of Readiness to Proceed (hereinafter "DOR") dated February 1, 2024, based on the  
following:

- 1) Applicant's attorney made no specific good-faith efforts to discuss and/or resolve the  
issues prior to the filing of this DOR. Defendant was never properly served with notice  
of the DOR. Defendant reserves the right to seek sanctions, penalties, and costs due to  
applicant's attorney's inappropriate filing and waste of resources and time of the WCAB  
and Defendant.
- 2) Applicant's DOR is premature as this time as discovery is ongoing.

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1       WHEREFORE, based on the above, Defendant respectfully requests that applicant's  
2 attorney's DOR be denied and the MSC set before this Honorable Court on March 28, 2024, at  
3 8:30 a.m., be taken off calendar.

4  
5 Dated: February 28, 2024

Respectfully submitted,

6       **ALBERT AND MACKENZIE**

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9 BY: 

10       ARIAN KHODAKARAMI, ESQ.  
11       Attorney for Defendant(s)  
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I am an attorney-at-law, duly licensed to practice before the Courts of the State of California. I am the attorney of record for the defendant herein. I have personal knowledge of the foregoing, and if called upon to testify, I could and would competently testify to its contents.

ALBERT AND MACKENZIE

**BY:**

ARIAN KHODAKARAMI, ESQ.

Proof of Service by Mail

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

Uniform Assigned Name : ALBERT MACKENZIE LONG BEACH  
EAMS Administrator Name : Bruce H. Albert  
EAMS Administrator's Phone : (818) 575-9876  
EAMS Administrator Email : wcab@albmac.com

**RE: JAVIER VALDIVIA v. MC CULLAH CONSTRUCTION COMPANY, INC.**  
**CASE NO: ADJ9571493, ADJ9571493**

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years, and not a party to the within action; my business address is 28216 Dorothy Drive, Suite 200, Agoura Hills, CA 91301.

On February 28, 2024, I served the foregoing document described as:

**OBJECTION TO DECLARATION OF READINESS TO PROCEED**

on the interested persons to the within action by enclosing a true copy thereof in a sealed envelope addressed as follows:

Workers' Compensation Appeals Board  
320 West Fourth Street, Ninth Floor  
Los Angeles, CA 90013-1105  
(XX) Filed electronically via EAMS

Zurich American Insurance Company  
P.O. Box 968005  
Schaumburg, IL 60796

Gallagher Bassett Services - AIG/Folsom  
Attn: Latisha Ryan, Claims Representative  
P.O. Box 4210  
Clinton, IA 52733  
Claim No. 030129-016982, 030129-016982-  
WC-01

Accurate Business Solutions  
1522 Constitution Blvd., Ste. 333  
Salinas, CA 93905

Advance Care Specialists  
5151 Oceanus Dr., Ste. 106  
Huntington Beach, CA 92649

Telleria Telleria & Levy LLP  
828 West Las Tunas Drive  
San Gabriel, CA 91776

Biocare Rx Specialty Pharmacy  
5435 Balboa Boulevard, Suite 209  
Encino, CA 91316-1579

Javier Valdivia  
710 South Maple Avenue, Space 21  
Montebello, CA 90640

California Urgent Care Center  
250 N. Robertson Blvd, Ste. 108  
Beverly Hills, CA 90211

American Claims Management, Inc.  
P.O. Box 85251  
San Diego, CA 92186-5251

Centerline Diagnostics  
154 W. Foothill Blvd., Ste. 518  
Upland, CA 91786

Zurich American - Dallas  
P.O. Box 968023  
Schaumburg, IL 60196

Comprehensive Outpatient Surgery Center  
250 N. Robertson Boulevard #508  
Beverly Hills, CA 90211

1 Z-A Management  
2 250 N. Robertson Blvd., Suite 108  
3 Beverly Hills, CA 90211

Del Carmen Medical Center  
715 N. Rodeo Drive  
Beverly Hills, CA 90210

4 Altos Inc Irvine  
5 14252 Culver Dr Suite 836  
6 Irvine, Ca 92604

Edwin Haronian  
5651 Sepulveda Boulevard, Suite 201  
Sherman Oaks, CA 91411

7 Innovative Medical Management Anaheim  
8 4175 E. La Palma Avenue, Suite 105  
9 Anaheim, CA 92807

Enhanced Precision Care  
530 W. Badillo Street, Suite D  
Covina, CA 91722

10 Maximum Medical Costa Mesa  
11 3187 Red Hill Ave, Ste 150  
12 Costa Mesa, CA 92626

HMS Dept of Health Care Sacramento  
660 J Street, Suite 270  
Sacramento, CA 95814

13 Paramount MGT Services Sherman Oaks  
14 1419 San Fernando Road  
15 BAD ADDRESS  
16 Burbank, CA 91502

LPR Podiatry  
311 North Verdugo Road  
Glendale, CA 91206

17 Synapse Lien Unit  
18 P.O. Box 261130  
19 Encino, CA 91426

Mesa Pharmacy  
2973 Harbor Boulevard, Suite 488  
Costa Mesa, CA 92626

20 Monarch Med Mgmt  
21 10020 Indiana Ave., Apt 205  
22 Riverside, CA 92503

MH Express Pharmacy  
P.O. Box 1168  
Monrovia, CA 91017

23 Moussa Moshfegh  
24 6221 Wilshire Blvd., Ste 404  
25 Los Angeles, CA 90048

TPC Recovery  
P.O. Box 74488  
Los Angeles, CA 90004

26 QBC Los Angeles  
27 4601 Wilshire Blvd., Third Floor  
28 Los Angeles, CA 90010

RM Schilling Inc.  
Post Office Box 1144  
Placentia, CA 92871

Rehab Solutions Irvine  
P O Box 10382  
Santa Ana. CA 92711

San Gabriel River Medical Group, P.C.  
350 N Glendale Ave Ste 509  
Glendale, CA 91206

**XX BY MAIL**

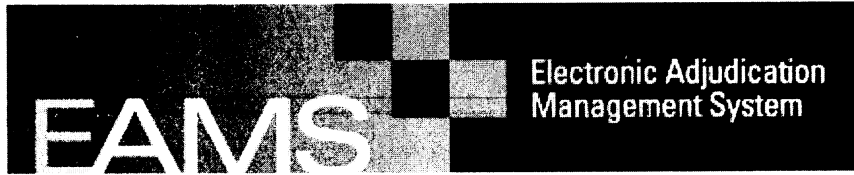
**XX** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service with postage thereon fully prepaid at Encino, California in the ordinary course of business.

Executed on February 28, 2024 at Agoura Hills, California.

**XX** (State) I declare, under penalty of perjury, under the laws of the State of California that the above is true and correct.

Wendi Stanfill  
Typed Name

Wendi Stanfill  
Signature #50326



MAR 11 2024

Submission of this eform through EAMS constitutes service upon any internal DWC unit.

Batch ID: 40251800 Date: 02/29/2024 10:15:28 AM

OK