

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.

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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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1. The first part of the document is a list of names and addresses of the members of the committee.

2. The second part of the document is a list of names and addresses of the members of the committee.

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. The first part of the document is a list of names and addresses of the members of the committee.

2. The second part of the document is a list of names and addresses of the members of the committee.

1	Z-A Management 250 N. Robertson Blvd., Suite 108 Beverly Hills, CA 90211	Del Carmen Medical Center 715 N. Rodeo Drive Beverly Hills, CA 90210
3	Altos Inc Irvine 14252 Culver Dr Suite 836 Irvine, Ca 92604	Edwin Haronian 5651 Sepulveda Boulevard, Suite 201 Sherman Oaks, CA 91411
5	Innovative Medical Management Anaheim 4175 E. La Palma Avenue, Suite 105 Anaheim, CA 92807	Enhanced Precision Care 530 W. Badillo Street, Suite D Covina, CA 91722
7	Maximum Medical Costa Mesa 3187 Red Hill Ave, Ste 150 Costa Mesa, CA 92626	HMS Dept of Health Care Sacramento 660 J Street, Suite 270 Sacramento, CA 95814
9	Paramount MGT Services Sherman Oaks 1419 San Fernando Road BAD ADDRESS Burbank, CA 91502	LPR Podiatry 311 North Verdugo Road Glendale, CA 91206
12	Synapse Lien Unit P.O. Box 261130 Encino, CA 91426	Mesa Pharmacy 2973 Harbor Boulevard, Suite 488 Costa Mesa, CA 92626
14	Monarch Med Mgmt 10020 Indiana Ave., Apt 205 Riverside, CA 92503	MH Express Pharmacy P.O. Box 1168 Monrovia, CA 91017
16	Moussa Moshfegh 6221 Wilshire Blvd., Ste 404 Los Angeles, CA 90048	TPC Recovery P.O. Box 74488 Los Angeles, CA 90004
18	QBC Los Angeles 4601 Wilshire Blvd., Third Floor Los Angeles, CA 90010	RM Schilling Inc. Post Office Box 1144 Placentia, CA 92871
20	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

22 **XX BY MAIL**

23 **XX** I am "readily familiar" with the firm's practice of collection and processing
24 correspondence for mailing. Under that practice it would be deposited with the
25 U.S. Postal Service with postage thereon fully prepaid at Encino, California in the
26 ordinary course of business.
27 Executed on February 28, 2024 at Agoura Hills, California.
28 **XX** (State) I declare, under penalty of perjury, under the laws of the State of California
that the above is true and correct.

27 Wendi Stanfill

28 Typed Name

Wendi Stanfill

Signature

#50326

