



FS&K
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Workers' Compensation Legislative and Judicial Update and Hot Button Issues - July 2015



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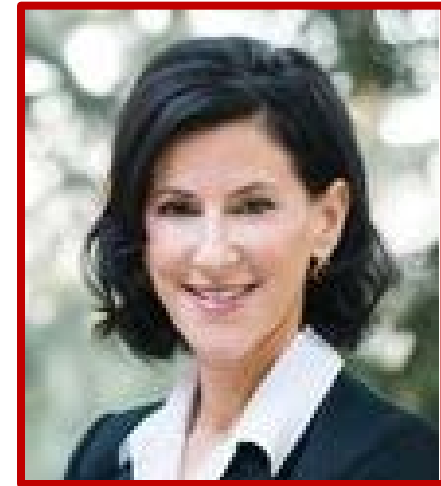
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Rene Thomas Folsie



- Practiced law since 1974.
- Licensed Psychologist in 1989.
- Mostly WC defense with Miller & Folsie 1975-1995. Emphasis on psyche cases.
- 1995 to 2005, consulting, and special education advocacy.
- 2005 – 2008 WorkCompCentral Instructor
- Present – Floyd, Skeren and Kelly.

Jamie L. Berenson



- Partner - Glauber Berenson, Glendale California.
- BA from UCSB in 1989 and JD from Southwestern in 1992.
- Super Lawyer, Los Angeles Magazine, 2005 – 2015
- California Applicants Attorneys Association, Board of Governors, 2004 – Present
- State Bar of California, Workers Compensation Section, Chair, 2002 - 2005

Todd T. Kelly



- Partner with the Law Offices of Floyd, Skeren & Kelly, LLP.
- State Bar Certified Specialist in Workers' Compensation
- Recognized as a lifetime member by Cambridge Who's Who.
- 2009 Southern California Super Lawyers
- Gold Congressional Awardee
- Paul Harris Fellow with Rotary International.



Workers' Compensation Legislative and Judicial Update and Hot Button Issues - July 2015

We are here



Introduction

Jurisdiction and Exclusive Remedy

Injury AOE-COE

Employment Issues (Omit)

Insurance Coverage

TD, PD –Apportionment

Cost of Living Adjustment (Omit)

Medical Care and MPN Issues

Death Benefits (Omit)

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PQME, UR, IMR and IBR Process

Medicare Set Aside Issues (Omit)

CIGA Litigation (Omit)

Practice and Procedure (Omit)

Fraud

Stare Decisis and “Citable Law”

- The principle of stare decisis is a rule that **a decision made by a higher court is binding precedent** (also known as mandatory authority) which a lower court cannot overturn.
- The WCAB case reporting system Cal Comp Cases does not clearly distinguish between levels of case authority.
- CCC’s also cite “cases” that are not binding on anyone. They are “persuasive but not controlling law”



State of California • Courts of Appeal
Appellate Districts



“Stare Decisis” Pecking Order



Federal Courts Where
Supremacy Clause Applies

Supreme Court

The Law of Sister States
Under Full Faith & Credit

**Persuasive But Not
Controlling Law**

Court of Appeal
“Unpublished”

Court of Appeal
“Writ Denied”

WCAB – Panel Decision

WCAB – Trial Level

Court of Appeal

WCAB - EnBanc



Workers' Compensation Legislative and Judicial Update and Hot Button Issues - July 2015

We are here

Lesson Today:
Topics



Introduction

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Injury AOE-COE

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Insurance Coverage

TD, PD –Apportionment

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Medical Care and MPN Issues

Death Benefits (Omit)

Penalties & Extraordinary Remedies

PQME, UR, IMR and IBR Process

Medicare Set Aside Issues (Omit)

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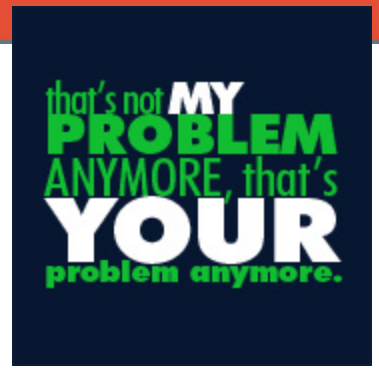
Practice and Procedure (Omit)

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SB 863 Limits WCAB

Jurisdiction Over Medical Issues

- LC 4604 jurisdictional grant provides “controversies between employer and employee arising under this chapter shall be determined by the appeals board, **except as otherwise provided by Section 4610.5**”
- **SB 863** creates the Independent Medical Review and Independent Bill Review process.
- **Jurisdiction to resolve these controversies no longer reside in the WCAB except for very narrow appellate reasons.**



Professional Athletes Exempted by 2014 Law



- With respect to cumulative injury, a professional athlete who has been hired outside of this state and performs 20% or less of work here, and his or her employer shall be exempted from the provisions of this division if..
 - The employer provides comp in the other state.
 - The coverage applies to work in California



Workers' Compensation Legislative and Judicial Update and Hot Button Issues - July 2015

Introduction

Jurisdiction and Exclusive Remedy

Injury AOE-COE

Employment Issues (Omit)

Insurance Coverage

TD, PD –Apportionment

Cost of Living Adjustment (Omit)

Medical Care and MPN Issues

Death Benefits (Omit)

Penalties & Extraordinary Remedies

PQME, UR, IMR and IBR Process

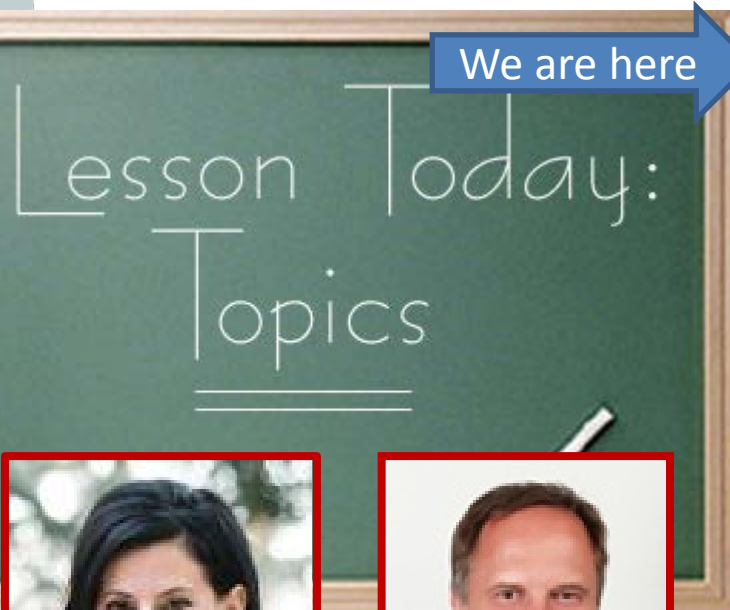
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Fraud

We are here



Limits to “California Add-Ons”



- L.C. 4660.1(c) (1) Except as provided in paragraph (2), **there shall be no increases in impairment ratings for sleep dysfunction, sexual dysfunction, or psychiatric disorder, or any combination thereof, arising out of a compensable physical injury.** Nothing in this section shall limit the ability of an injured employee to obtain treatment for sleep dysfunction, sexual dysfunction, or psychiatric disorder, if any, that are a consequence of an industrial injury.

AMA Guides and The 6 “California Add-ons”*

The chapters in red provide potential for additional permanent impairment. There is controversy over how to rate cases where there is impairment in more than one organ system area. (i.e. a back injury that causes sleep or sexual disturbance).

1. Philosophy, Purpose and Appropriate Use
2. Practical Application of the *Guides*
3. Cardiovascular System: Heart and Aorta
4. * Cardiovascular System: Systemic and Pulmonary Arteries (Hypertension)
5. The Respiratory System
6. * The Digestive System (Gastrointestinal)
7. * The Urinary and Reproductive Systems
8. The Skin
9. The Hematopoietic System
10. The Endocrine System
11. Ear, Nose, Throat and Related Structures
12. The Visual System
13. * The Central and Peripheral Nervous System (Sleep Disturbance)
14. * Mental and Behavioral Disorders
15. The Spine
16. The Upper Extremities
17. The Lower Extremities
18. * Pain

Exception for California Add-Ons



- L.C. 4660.1(c)(2) An increased impairment rating for psychiatric disorder **shall not be subject to paragraph (1)** if the compensable psychiatric injury resulted from either of the following:
 - (A) **Being a victim of a violent act or direct exposure to a significant violent act within the meaning of Section 3208.3.**
 - (B) **A catastrophic injury, including, but not limited to, loss of a limb, paralysis, severe burn, or severe head injury. CAAA plans litigation**

Mental-Mental, Physical-Mental and Mental Physical Injuries

The “51%” rule now applies to three types of psychiatric injuries.

- A **mental-mental injury** is a mental stressor causes a mental illness.
- A **physical-mental injury** means a physical injury later causes a mental illness, such as a worker who has a spine injury and later gets depressed over it.
Lockheed-Martin v WCAB (McCullough) (2002) 67CCC245
- A **mental-physical injury** is a mental stressor causing physical effects, such as a stress induced headache – **San Bernardino v. Workers' Comp Appeals Bd. (McCoy) (2012)**



Physiological Manifestations of Psyche Injury



- Claimant was found to have **non-compensable psyche injury**, but the WCJ found that **the related headache was compensable as it was a “physical injury”**
- HELD: **labor code section 3208.3 standards for psychiatric injuries apply to physiological manifestations of emotional stress.**
- San Bernardino V. Workers' Comp Appeals Bd. (**McCoy**) (2012) 203 Cal.App.4th 1469, 138 Cal. Rptr. 3d 328, 77 Cal. Comp Cases 219

EVERYTHING
HURTS. AND WHAT
DOESN'T HURT,
DOESN'T
WORK!

McCoy Case

Extended in Oliver

- Oliver claimed injury to her **heart**, cardiovascular system (in the form of **hypertension**), **thyroid, vocal cords, throat**, neurological system (in the form of **headaches**), gastrointestinal system (in the form of **gastroesophageal reflux disease**) and **psychological** system.
- HELD: the WCJ issued a **take nothing with respect to the physiological consequences of the non-industrial psychiatric injury.**
- Meredith Oliver v AstraZenica (Nov, 2012) Noteworthy panel decision **sustained WCJ**

Argument Not Made In Banuelos

- Banuelos suffered a stroke as a result of stress on the job. WCJ found injury which was affirmed on Reconsideration.
- **HOWEVER**, no argument was made about the applicability of 3208.3 or Oliver/McCoy or the 51 percent threshold.
- Panel decision of Luis Banuelos v Acorn Engineering Company 2015 Cal. Wrk. Comp. P.D. LEXIS 121(2015)



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Employment Issues (Omit)

Insurance Coverage

TD, PD –Apportionment

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Death Benefits (Omit)

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Fraud



Temp Agencies Must Buy Insurance



- **LC 3701.9 Prohibits Professional Employer Organizations (PEOs) and temporary staffing agencies from becoming self-insured for workers compensation purposes**
- **Requires any of these entities that are currently self-insured to become insured by January 1, 2015.**
- **This will have a profound effect on this**

Challenge to Temp Agency Law Fails



- Kimco provides staffing solutions to various industries, including financial, healthcare and technical/engineering. Challenged L.C. 3701.9 as unconstitutional violation of equal protection.
- HELD: There is a rational basis to treat temp agencies differently because of the high risk of unsecured loss.
- Kimco Staffing Services v State of California (May 2015) Court of Appeal (published)

Policies With Large Deductibles

- Insurance policies written with deductibles provide that the insurer will pay the defense and indemnity costs in connection with a covered claim, and then charge or bill back the deductible amount to the insured.
- Lumbermen's Underwriting Alliance headed to receivership over Tri-State Employment unpaid bill. 6080 open WC claims may be headed to CIGA





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Injury AOE-COE

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TD, PD –Apportionment

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Death Benefits (Omit)

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Total Disability Case Potential



- There is a **big difference** between **99 ¾%** and a **100%** case.
- A **100%** case pays the **TTD rate for life**, increased each year for **inflation**.
- A 100% case pays an **attorney fee up front** based upon a speculative life span, and speculative inflation increases, in excess of \$150,000.
- **After the LeBoeuf decision**, the possibility of an award of total disability has been enhanced, and applicant attorneys will work hard to meet this choice goal.

LeBoeuf Your Way to Success



- A permanent disability rating should reflect as accurately as possible an injured employee's diminished ability to compete in the open labor market. **The fact that a worker has been precluded from vocational retraining is a significant factor to be taken into account** in evaluating his or her potential employability...
- LeBoeuf v. W.C.A.B. (1983) 4 Cal Comp Cases 587

LeBoeuf Awards Now Limited



- Injuries when combined with **inability to read and write English** supported finding by the WCJ at that he was **100%**.
- HELD LC 4663 provides that an **employer is liable only for the percentage of permanent disability directly caused by his industrial injuries**. The inability to read and write in English was not directly caused by the injury, and therefore should not be a basis for the total disability award. Limits application of LeBoeuf v. Workers Comp. Appeals Bd.(1983) 34 Cal.3d 234. **100% award reversed.**
- 6th DCA published, Hertz v WCAB (Aguilar)(2008) 169 CA 4th 232, 73 CCC 1653. March 2009 writ granted by Supreme Ct. dismissed without comment on May 20, 2010

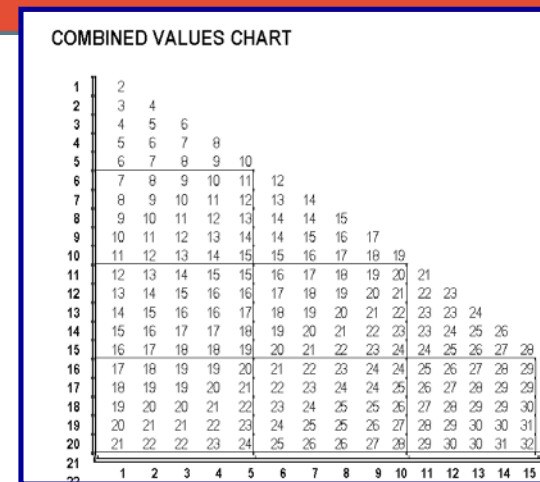
Benson Apportionment Math in 100% Case



- **Total disability caused half by specific and half by CT becoming P&S at the same time. Each case separately rated and was awarded 59.25% PD in each case, but no life pension. This avoided any life pension!**
- **HELD: Correct** under *Benson v. W.C.A.B.* (2009) 170 Cal. App. 4th 1535, 89 Cal. Rptr. 3d 166, 74 Cal. Comp. Cases 113
- Panel decision in *Young v WCAB, Union Pacific Resources/Tidelands Oil* (Mar 2010)

Rebutting the AMA Guides CVC

- WCAB panel decision in **Richard Kite v Athens Administrators (2013)** involved injury to left and right hip. **WCJ based upon QME opinion added rather than combined each hip rating.**
- Subsequent panel cases have confirmed the principle that the CVC (PDRS Page 8-2) is not mandatory, and can be rebutted for good cause.
- **It is now much easier to reach life pension or total disability** in multiple body part cases.





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Insurance Coverage

TD, PD –Apportionment

Cost of Living Adjustment (Omit)

Medical Care and MPN Issues

Death Benefits (Omit)

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Fraud



We are here



What is Evidence Based Medicine?



- Evidence-based medicine (EBM) aims to apply evidence gained from the scientific method to certain parts of medical practice. It seeks to assess the quality of evidence relevant to the risks and benefits of treatments (including lack of treatment). According to the Centre for Evidence-Based Medicine, **“Evidence-based medicine is the conscientious, explicit and judicious use of current best evidence in making decisions about the care of individual patients”**. (Wikipedia)

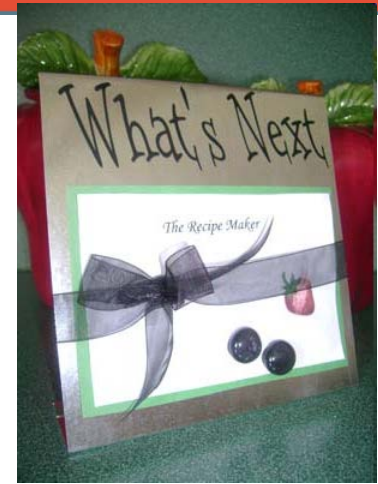
WCAB Says “NO” to Medical Marijuana



- WCJ ordered reimbursement for self-procured medical marijuana.
- HELD: WCAB reversed. H&S 11362.785(d) says “Nothing in this article [Medical Marijuana Program] shall require...any... health insurance provider to be liable...for the medical use of marijuana.”
- Panel decision of Christopher Cockrell v Farmers Insurance (March 2013)

(Next Step ?? - Pay For Performance Medicine)

- (CHSWC-2007) “There may be potential for creating financial incentives to encourage and reward the delivery of high-quality, efficient care to California’s injured workers. **Recently, financial incentives or pay-for-performance mechanisms have rapidly gained favor in other health care sectors but have been rarely used in workers’ compensation”.**
- April 2015 **Congress passes the Historic Medicare and CHIP Reauthorization Act (MACRA)** that implements Pay for Performance in Medicare





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Introduction

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Injury AOE-COE

Employment Issues (Omit)

Insurance Coverage

TD, PD –Apportionment

Cost of Living Adjustment (Omit)

Medical Care and MPN Issues

Death Benefits (Omit)

Penalties & Extraordinary Remedies

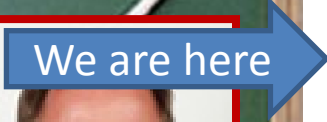
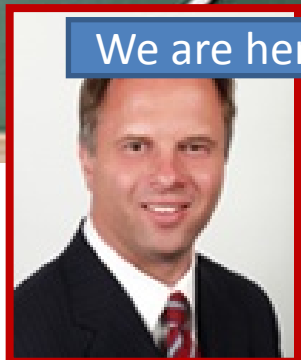
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Is RICO a Possibility?



- Michigan claimant alleged that employer/carrier defrauded him with “false” medical testimony, and filed federal Racketeer Influenced and Corrupt Organizations Act RICO case.
- Held: **No cause of action in 6th Circuit (Kentucky, Michigan, Ohio, and Tennessee) Brown v. Ajax Paving Industries (May 2014)**
- **BUT Watch -- Miller et al. v. York Risk Services Group** in Arizona working its way through 9th Circuit. So far trial judge refused to dismiss case.



Workers' Compensation Legislative and Judicial Update and Hot Button Issues - July 2015

Introduction

Jurisdiction and Exclusive Remedy

Injury AOE-COE

Employment Issues (Omit)

Insurance Coverage

TD, PD –Apportionment

Cost of Living Adjustment (Omit)

Medical Care and MPN Issues

Death Benefits (Omit)

Penalties & Extraordinary Remedies

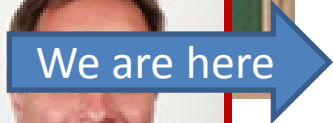
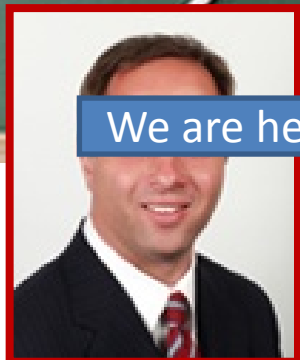
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Fraud



We are here

Available Tools Used to Contain Medical Costs



- **Price Regulation: How much is paid for care?**

(OMFS - Medical Bill Re-Pricing) The costs of treatment are regulated by fee schedules (OMFS). Separately negotiated prices between payers and medical providers are allowed under MPN programs.

- **Quantity Regulation: What treatment is necessary?**

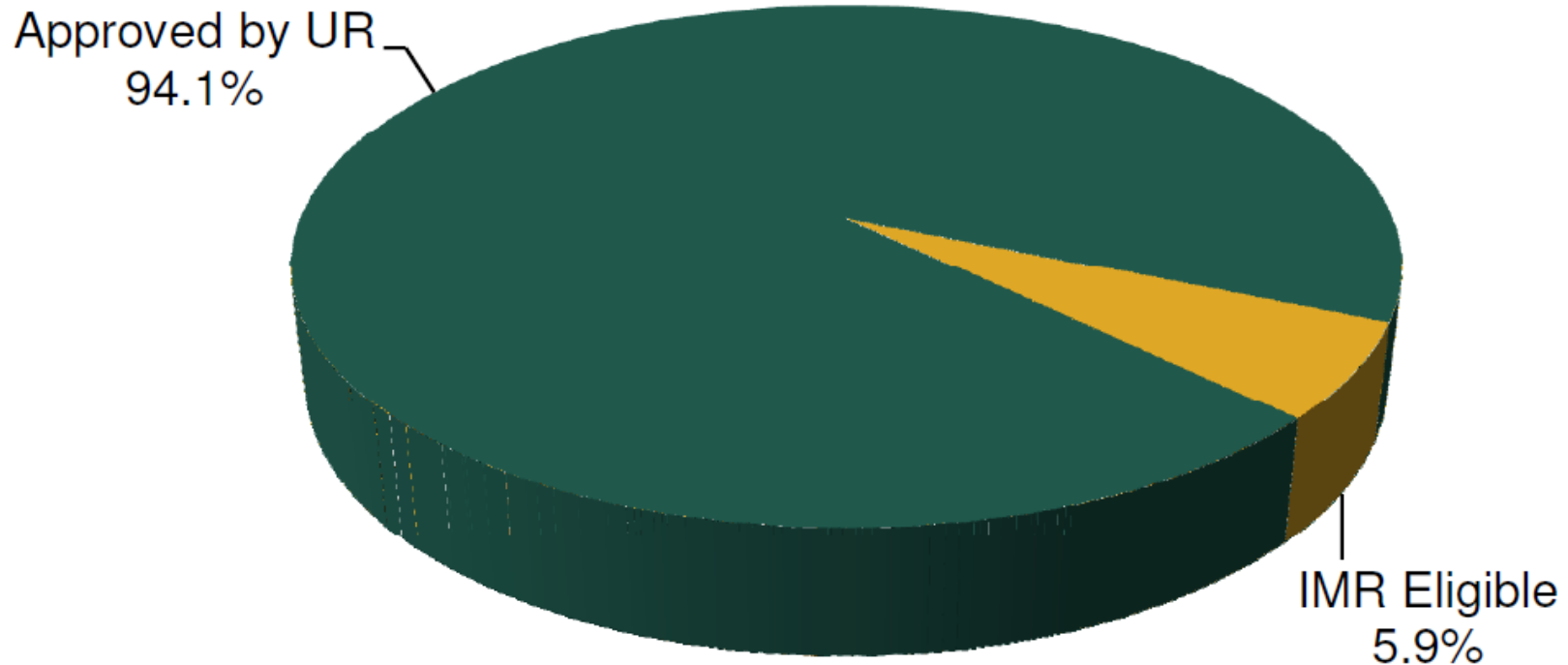
(Utilization Review) Nationally recognized medical care guidelines (ACOEM) are used to evaluate and determine the appropriateness of treatment requests. (Caps) Limits on Chiropractic and PT visits.

- **Price and Quantity Regulation: Who provides medical**

treatment? (Medical Provider Network) The determination of which party decides who will treat the patient is obviously critical to the medical management direction of any claim.

94.1% of RFAs are Approved

California Workers' Compensation Utilization Review Approval Rate



Source: CWCI April 2015 Report “Independent Medical Review Outcomes In California Workers’ Compensation”

UR Upheld in 91.4% of Reviews

Service Type	# of Services	% of Services	% Upheld
Prescription Drugs	113,169	44.7%	91.9%
Durable Medical Equipment, Prosthetics, Orthotics, Supplies	24,720	9.8%	93.7%
Physical Therapy	23,583	9.3%	94.0%
Injections	15,004	5.9%	92.2%
Diagnostic Tests & Measurements	12,382	4.9%	87.9%
Surgery	11,891	4.7%	88.5%
MRI/CT/PET Scans	9,635	3.8%	89.1%
Laboratory & Pathology	7,314	2.9%	87.3%
Acupuncture	5,413	2.1%	94.1%
Psych	5,255	2.1%	84.9%
Chiropractic	4,717	1.9%	95.4%
Evaluation & Management	4,178	1.7%	79.5%
Functional Restoration	2,961	1.2%	92.6%
Non-Surgical Procedures	2,407	1.0%	93.3%
Other Radiology	2,396	0.9%	88.6%
Pain Management	2,025	0.8%	80.3%
Home Health Care	1,623	0.6%	97.1%
Other	4,265	1.7%	90.4%
Total¹⁰	252,938	100%	<u>91.4%</u>

Source: CWCI April 2015 Report “Independent Medical Review Outcomes In California Workers’ Compensation”

A Few Bad Apples...



- **10 providers alone** were named on 11 percent (14,525) of the IMR determination letters and **accounted for 15 percent of the disputed services submitted for independent medical review.**

Provider	Letters	Services	Claims	IMR Upheld
Provider 1	1.9%	1.9%	3.1%	91.4%
Provider 2	1.6%	3.2%	1.9%	94.7%
Provider 3	1.0%	2.3%	1.1%	91.5%
Provider 4	0.9%	1.6%	1.2%	94.4%
Provider 5	0.9%	1.1%	1.3%	87.3%
Provider 6	0.9%	1.0%	1.3%	89.8%
Provider 7	0.8%	1.1%	1.1%	90.3%
Provider 8	0.8%	1.1%	1.0%	88.8%
Provider 9	0.8%	0.9%	1.0%	88.8%
Provider 10	0.8%	0.8%	1.0%	86.3%
TOP 10	11%	15%	14%	91.3%

Source: CWCI April 2015 Report “Independent Medical Review Outcomes In California Workers’ Compensation”

WCAB Decides Medical Necessity if UR “Untimely”



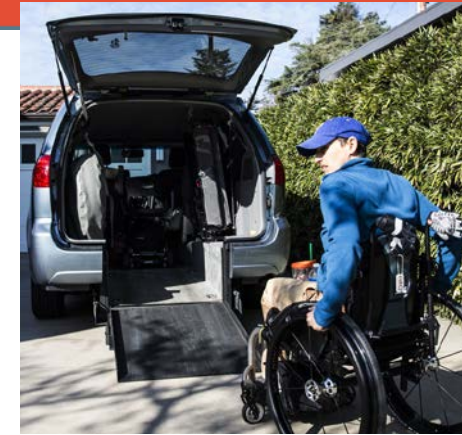
- Employer refers treatment request to UR, but WCJ said it was “invalid” because of various defects. WCJ however sent case to IMR to decide.
- **HELD: When UR was untimely, WCAB (Not IMR) is to decide medical necessity based upon substantial medical evidence.**
- En banc *Dubon v. World Restoration, Inc* (2014) 79 Cal. Comp. Cases 1298 (*Dubon II*)

More Technical Challenges to UR

- Logudice v Mimi's Cafe (4/1/15, Panel): No RFA needed (and employer liable for) residential relocation, moving costs, rent differential, and housekeeping services.
- Patterson (7/24/14, Panel): UR and IMR not needed to reinstate nurse case manager where the employer unilaterally cut off.



Is IMR Constitutional?



- Frances Stevens, tripped and broke her foot which became CRPS. She has 100% PD, was wheelchair bound and had a home health aid for two years which was then rejected by timely UR/IMR.
- WCJ/WCAB had no jurisdiction to do anything about the decision. 1st DCA has granted a writ to study **constitutional challenge**.
- Frances Stevens, v. WCAB, Outspoken Enterprises, Inc., (**CASE PENDING**)

Second IMR Challenge



- Ramirez had a stipulated award with future medical care. PTP asked for 12 acupuncture sessions. UR and IMR declined with anonymous IMR doctor claiming PTP's claim of functional improvement was "not credible"
- HELD: No jurisdiction at WCAB and no right to discovery.
- Ramirez v State of California - 3rd DCA issued writ (**CASE PENDING**)

Ogden v WCAB (Ritzhoff)

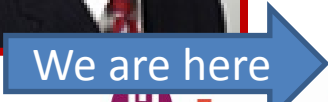


- WCJ refused to allow cross examination of applicant in psychiatric case where applicant had been declared a “vexatious litigant.”
- HELD: Cross examination of the applicant is a fundamental right.
- Court of appeal published case (233 CA4th 970, 80 CCC 1) is being used to support arguments in Stephens, Ramirez that “cross examination” is part of due process rights.



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We are here 

- Introduction
- Jurisdiction and Exclusive Remedy
- Injury AOE-COE
- Employment Issues (**Omit**)
- Insurance Coverage
- TD, PD –Apportionment
- Cost of Living Adjustment (**Omit**)
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- Practice and Procedure (**Omit**)

Fraud
Learn. Network. Repeat.

Fraud Prosecutions for Exaggeration

- In past years there has been an increase in claimant fraud prosecutions. It is no longer uncommon for claimants to be prosecuted for withholding correct histories, or exaggerating claims discovered by surveillance.
- e.g., Nicole Nunez, nurse at Kern Medical Center arrested when films showing her in her SUV performing activities she denied 30 minutes later at time of examination. (June 2014)



Singer Drummer Arrested for Exaggeration



- Susette Boggs reported that she had been bitten by a tick, contracted Lyme disease and **reported difficulty sitting for long periods holding items due to weakness in her hands as well as other symptoms.**
- **Video evidence showed Boggs maintaining a physically active lifestyle as a drummer/singer in a band since 2007**
- If convicted Boggs faces a possible sentence of maximum seven years in prison and restitution of \$364,932.

(May 2014)



BOGGS, SUSETTE

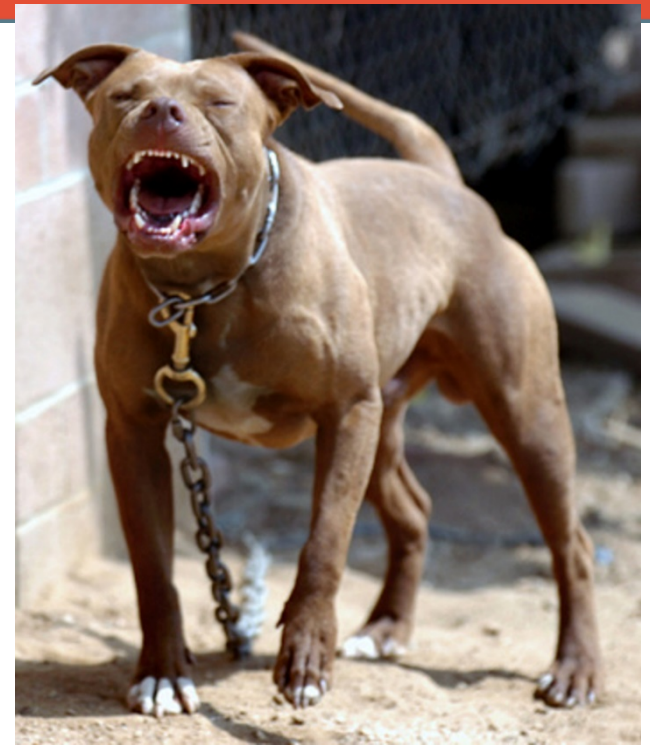
Truck Driver Gets 8 Years For Exaggeration

- Chip Kyle Bolton Salinas resident and **truck driver** said he couldn't stand for more than an hour, rendering him unable to hold his baby daughter.
- He was **filmed at the YMCA exercising on an elliptical and playing basketball** - activities he later denied at his deposition.
- **Sentenced to 8 years in prison after jury trial**. (April 2014)



Failure to Disclose History

- Dario Rudas-Ortega, 53, an Adelanto cable installer bitten by pit bull. He **failed to disclose information regarding his prior medical condition and prior medical treatment to the same body part.**
- Arrested, booked and awaiting trial.
- Faces five years in prison. (April 2014)



Comp Fraud Trend



- Years ago, it was almost impossible to get a prosecution in anything but a clear case. (rare)
- **Now we get prosecutions for exaggeration, false histories, fake identifications and more**
- Largely attributable to multimillion dollar funding from surcharged employers to district attorneys divided up annually by performance
- **BUT Organized International Crime has invaded medicine nationwide.**

Conclusions – Take Aways

- Efforts to limit extraterritorial and judicial jurisdiction are met with substantial applicant resistance.
- Self insurance options for private employers are disappearing
- Defense strategies to limit PD awards have improved under new law.
- Access to care continues under the UR, IMR process, but this is disputed by applicant attorneys
- Pay for Performance Fee Schedules are on the horizon
- There is a threat of RICO litigation in the 9th Circuit
- Fraud prosecutions have involved more grey area cases than ever before.



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