

In the Matter of:

EDWARD CORONA vs STAFFMARK

EDWARD CORONA

March 23, 2026



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**BEFORE THE WORKERS' COMPENSATION APPEALS BOARD
OF THE STATE OF CALIFORNIA**

EDWARD CORONA,

Applicant,

vs.

WCAB NO. ADJ19781161

**STAFFMARK, INSURED BY ACE AMERICAN
INSURANCE COMPANY ADMINISTERED BY
CCMSI,**

Defendants.

**Deposition of EDWARD CORONA taken on behalf of
Defendant's, commencing at 10:06 A.M., Monday,
March 23, 2026, at 355 South Grand Avenue,
Suite 2450, Los Angeles, California 90071,
before AMY J. RAMOS, Certified Shorthand
Reporter, License No. 13311, within and for
the County of Los Angeles, State of California.**

1 **Appearances of Counsel:**

2

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I N D E X

EXAMINATION BY:

MS. CHOI	5
MR. DARDASHTI	49

EXHIBIT LIST

(None)

INFORMATION REQUESTED

(None)

MARKED QUESTIONS

(None)



1 Monday, March 23, 2026, 10:06 A.M.,

2 --oOo--

3 EDWARD CORONA,

4 called as a witness, having been duly affirmed, was
5 examined and testified as follows:

6 EXAMINATION

7 THE REPORTER: Good morning. My name is Amy
8 Ramos. I'm a certified shorthand reporter in the state of
9 California. My license number is 13311.

10 BY MS. CHOI:

11 Q Good morning.

12 A Good morning.

13 Q Good morning. Please state your full legal name
14 for the record please?

15 A My name is Edward Elias Corona. E-D-W-A-R-D
16 E-L-I-A-S C-O-R-O-N-A.

17 Q And is Elias your middle name?

18 A Yes, it is.

19 Q And have you ever gone by any other names before?

20 A No, not legally.

21 Q Have you ever given a deposition before today?

22 A Yes.

23 Q When was that?

24 A January of 2025.

25 Q And what was it in regards to?

1 A It was in regard to this workers' comp case with
2 the lawyers from Liberty Mutual.

3 MR. DARDASHTI: Counsel, just to safeguard from
4 any confusion, I think it would be helpful for us to each
5 make a statement on the record as to who we represent.

6 So this attorney is Sam Dardashti. We're present
7 in downtown Los Angeles at the noticed and stipulated
8 Volume II deposition from one of the defendants. Both
9 defendant representatives are present for this Volume II.

10 I believe that this deposition was noticed by the
11 defendant law firm, Park Guenthart.

12 Can we get counsel's names for the record?

13 MS. JONES: This is Nicole Jones with Hanna
14 Brophy, and I represent Liberty Mutual Insurance
15 Corporation.

16 MS. CHOI: My name is Anna Choi with Park
17 Guenthart, and we represent Staffmark, insured by Ace
18 American Insurance Company, administered by CCMSI.

19 MR. DARDASHTI: Thank you.

20 MS. CHOI: Can I continue?

21 MR. DARDASHTI: Yes.

22 BY MS. CHOI:

23 Q So for that prior workers' comp, the deposition,
24 do you remember the attorney that did the deposition? The
25 name of the attorney who did the deposition?

1 A Are you asking about my attorney, or the attorney
2 was questioning me?

3 Q That was questioning you.

4 A I don't remember the name off the top of my head.

5 MS. JONES: This is Nicole Jones of Hanna Brophy,
6 and I took applicant's deposition in 2025, January of
7 2025.

8 MS. CHOI: Thank you, Mrs. Jones.

9 BY MS. CHOI:

10 Q And did you meet with your attorney to prepare
11 for today's deposition?

12 A Yes, I did.

13 Q And around how long did you spend with your
14 attorney preparing for the deposition today?

15 A Roughly an hour.

16 Q Are you testifying from 355 South Grand Avenue,
17 suite 2450, today?

18 A Yes.

19 Q Mr. Corona, my name is Anna Choi, and I'm one of
20 the attorneys with Park Guenthart. Our firm represents
21 Staffmark, insured by Ace American Insurance Company,
22 administered by CCMSI.

23 What I'm going to do now is go over the ground
24 rules for the proceedings. It may be information your
25 attorney had already discussed with you, but I just want

1 to ensure that you understand the rules for today's
2 proceedings.

3 During this deposition, my job is to ask you
4 questions about the injuries you had while employed with
5 Staffmark, the doctors you have seen, and how you're doing
6 presently. I'll also be asking you questions about past
7 injuries that you may have had, as well as past doctors
8 that you may have seen. This allows us to get a better
9 overall picture of your case.

10 Do you understand?

11 A Yes, I do.

12 Q At the start of this deposition, the court
13 reporter had you take an oath to tell the truth. Although
14 we're not in a formal setting, you've been placed under
15 oath by the court reporter, and it will be the same oath
16 you would take if you were testifying in a court of law
17 before a judge or a jury.

18 You need to understand that the oath carries a
19 penalty of perjury, which is a felony if you fabricate
20 your testimony.

21 Do you understand?

22 A Yes, I do.

23 Q Your job during the course of the deposition will
24 be to answer the questions verbally, aloud, and to the
25 best of your ability. Please do not simply nod or shake

1 your head in response to the question. Please answer with
2 a verbal yes or no.

3 In case you do forget and do answer by gesture,
4 either I, your counsel or the court reporter will remind
5 you to say verbally whatever it is you wish to tell us.

6 Do you understand?

7 A Yes, I do.

8 Q During the deposition, it is usually easiest for
9 the court reporter if she only hears one voice at a time.
10 Please allow me to ask the complete question before you
11 give us your answer. I'll also try not to cut into your
12 answer, so that you can provide us with your complete and
13 total answer.

14 During this deposition, I'll sometimes ask
15 questions that require an estimate. For example, I may
16 ask how heavy an object was or how far you had to carry
17 that object. If you know exact weight or exact distance,
18 then that would be a perfect answer. However if you're
19 not certain, I'm still entitled to your best estimate
20 based on your memory and experience. But what we want to
21 avoid here is having you take a wild guess.

22 Do you understand?

23 A Yes, I do.

24 Q During this deposition, the court reporter is
25 going to record everything that we say today. At a future

1 date, you'll receive a word-for-word transcript or booklet
2 of the testimony that you give today. After you reviewed
3 the deposition transcript, if you wish to change any of
4 the answers that you've given us today, you're free to do
5 so.

6 However, I do want to caution you that if
7 substantial changes are made to your answers, I or some
8 other attorney may comment on those changes if and when
9 your case proceeds to trial, which can potentially have a
10 negative impact on your credibility. So it's very
11 important for you to ask if you need a question repeated,
12 rephrased or clarified. Because if you answer a question,
13 it will be presumed you understood the question.

14 Do you understand?

15 A Yes, I do.

16 Q During the deposition, I may ask you a question
17 that you do not know the answer to or that you do not
18 recall the answer to. If that's the case, you can simply
19 say, I don't know or I don't remember. However, you just
20 cannot use that as a tactic to avoid my questions.

21 Do you understand?

22 A Yes, I do.

23 Q During this deposition, if at any time you want
24 to take a break or speak with your attorney, please let us
25 know and we can take a break at any time.

1 Do you have any questions before we begin?

2 A No, I don't.

3 Q Okay. Have you taken any medications within 24
4 hours prior to this deposition?

5 A Yes, I did.

6 Q Can you tell me the names of those medicines?

7 A Metformin and Naproxen and Jardiance.

8 Those are the three medications.

9 Q Thank you. Do you feel that the medications you
10 have taken will prevent you from testifying at this
11 deposition today?

12 A No, I do not.

13 Q Have you taken any alcohol within 24 hours prior
14 to this deposition?

15 A No, I did not.

16 Q Do you drink or smoke?

17 A I drink occasionally, especially during sporting
18 events which I watch on TV, or I go to a bar and grill to
19 watch.

20 Q And do you smoke?

21 A I do not smoke very often. On occasion I smoke
22 cigars with my brother, but that's not even a monthly
23 thing.

24 Q How frequently would you say do you smoke? Just
25 an estimate.

1 A I would say the last time I smoked a cigar with
2 my brother would be maybe three months ago. By myself,
3 maybe two weeks ago.

4 Q What I want to now is take a look at a form of
5 identification from you, such as a driver license or ID
6 card. If you have that with you, if you could just hold
7 it up to the camera.

8 MR. DARDASHTI: You can show it to me first.

9 THE WITNESS: (Witness complies.)

10 MR. DARDASHTI: Let record reflect that I've -- I
11 observed it. I have handed the ID back to my client.
12 He'll show it to the camera.

13 Just please keep the driver's license number off
14 the record.

15 MS. CHOI: That's noted.

16 THE WITNESS: (Complies.)

17 MS. CHOI: Thank you.

18 BY MS. CHOI:

19 Q So I just wanted to confirm the address on your
20 driver's license is 1914 Sheffield Street, Hesperia,
21 California 92345.

22 Is that correct?

23 A The address you repeated is correct. It is no
24 longer my address.

25 Q The street was Sheffield; S-H-E-F-F-I-E-L-D.

1 What is your social security number?

2 MR. DARDASHTI: I'm going to go ahead and object,
3 and direct him not to answer on the record.

4 We can go off the record to get that.

5 MS. CHOI: Yes, let's go off record.

6 (Whereupon, a discussion was held off
7 the record.)

8 MS. CHOI: Back on the record.

9 BY MS. CHOI:

10 Q What is your date of birth?

11 A May 9, 1971.

12 Q Where were you born?

13 A San Bernardino, California.

14 Q And what is your highest level of education?

15 A Bachelor's of arts, with a degree in
16 Intercultural Environmental Studies.

17 Q Which school did you attend for that?

18 A Pitser College in Claremont, California.

19 Q Have you ever served in the military before?

20 A No.

21 Q Have you ever been convicted of a felony?

22 A Can I consult with my attorney once again?

23 Q Yes, sure.

24 MR. DARDASHTI: Go off the record.

25 (Whereupon, a discussion was held off

1 the record.)

2 MS. CHOI: I will go ahead and proceed.

3 BY MS. CHOI:

4 Q Have you ever been convicted of a felony?

5 A No.

6 Q Was is your current address?

7 A 9062 Date Street, Fontana, California 92335.

8 Q Just to clarify for Date Street, is it spelled

9 D-A-T-E?

10 A Yes, it is.

11 Q And how long have you lived in this residence
12 for?

13 A I have lived there since the end of March in
14 2024.

15 Q And is this a house?

16 A Yes, it is.

17 Q And does anyone live with you at your present
18 residence?

19 A Yes.

20 Q Who would those be?

21 A I live with a guy that I call my brother, he's
22 really my stepbrother. His name is Jose Salcido, his
23 wife, and their son.

24 Q And have you lived anywhere else in the last ten
25 years? If you can provide the addresses, going backwards.

1 A Before living at 9062 Date Street, I was living
2 in different Airbnbs. Also hotels for few months.

3 And before that, I was living at the address
4 given on my license, 19142 Sheffield Street in Hesperia,
5 California.

6 While I was living in Hesperia, I lived for a few
7 months in Las Vegas on Boulder Avenue. I don't remember
8 the address off the top of my head.

9 And before living in Hesperia, I lived in Kent,
10 Washington, for about a year.

11 Before living in Kent, Washington, my main
12 residence was at 1099 Oleander Avenue, Fontana,
13 California. And I lived there for about 15 years.

14 Q So for -- when you were living in the couple of
15 Airbnbs and hotels, was that in California?

16 What city was that in?

17 A I lived in Jurupa Valley. I lived in Chino for a
18 short period in a Motel 6.

19 I probably lived in about five different places
20 in my transition from going -- from Hesperia to where I'm
21 currently at, in Fontana.

22 Q They were all basically in California area?

23 A All in the Ontario area, where most of my
24 warehouse work has been.

25 Q What would you say was the average time frame?

1 Like year to year?

2 A Most of my Airbnb stays were maybe two or three
3 weeks. In between going from one to another, I would stay
4 at hotels for maybe four days at a time.

5 Q But do you recall, like, the actual year? Like
6 whether it was 2012 or?

7 A I moved out of Hesperia in October of 2023, I
8 believe. And up until March of 2024, that's when I was
9 jumping around in Airbnbs and hotels.

10 MR. DARDASHTI: Counsel, can we go off the record
11 for a few seconds?

12 MS. CHOI: Sure.

13 (Whereupon, a discussion was held off
14 the record.)

15 MS. CHOI: Okay.

16 BY MS. CHOI:

17 Q So you said you were jumping around in Airbnbs
18 and hotels until around March 2024?

19 A Yes.

20 Q So right until then, that's when you went to your
21 current residence; is that correct?

22 A Yes it is.

23 Q And in what years were you in Kent, Washington?

24 A I moved to Washington in November of 2019, and I
25 stayed in a hotel in Chehalis for roughly a month.

1 Then I moved to Kent, Washington, in December of
2 2019, and stayed there until the following December 2020.

3 Q Okay. So you would say about a year in Kent
4 Washington; is that right?

5 A Yes.

6 Q Okay. And are you currently married?

7 A No.

8 Q And did you have any, like, prior marriages
9 before?

10 A No.

11 Q Do you have any children?

12 A No.

13 Q Okay. Do you currently have health insurance?

14 A Yes, I do.

15 Q Can you tell me the carrier name?

16 A It's in my pocket, if you want me to bring it
17 out.

18 It's Health Net.

19 Q Health Net. Is this through an employer?

20 A I'm in the process of having it switched to
21 Medi-Cal. Because now that I don't have an income, I
22 qualify for that.

23 Q Okay. So right now besides Health Net, you don't
24 have any other insurance; is that correct?

25 A It's correct. I don't have any other insurance.

1 Q Do you currently have a primary care physician or
2 family doctor?

3 A Yes, I do.

4 Q What is the doctor's name?

5 A Dr. Fakeh; F-A-K-E-H.

6 Q So just to clarify: That's Dr. Imun Fakeh?

7 A Yes, it is.

8 Q And do you recall the address of the doctor's
9 office?

10 A 7777 Milliken Avenue. I don't know the suite off
11 the top of my head.

12 Q Do you recall the city?

13 A Rancho Cucamonga, California.

14 Q And is this a clinic, hospital, or his own
15 office?

16 A It's in a building, roughly four or five stories
17 tall.

18 Q So it's not like part of a hospital, it's
19 basically -- he has his own office in there? Is that
20 correct?

21 A He has his own office, and there's an urgent care
22 below him.

23 Q And the urgent care and the doctor's office is
24 not related?

25 A It's not related.

1 Q Thank you. How long was this doctor your primary
2 doctor?

3 A He's been my primary doctor for a little more
4 than a year.

5 Q When is last time that you saw that doctor?

6 A I believe our last appointment was in January.

7 Q January of this year?

8 A Yes.

9 Q And did you have a different primary care doctor
10 that?

11 A The doctor who performed my surgeries on my leg
12 when I had an amputation was Dr. Fong Dardan. He's my
13 acting primary care physician for a few months.

14 Q Can you specify for that few months, the time
15 period?

16 A He was my acting primary care physician from
17 October of 2024 until January 2025.

18 Q Just to clarify: You only visited him regarding
19 the surgery on the leg? Is that correct?

20 Or was there any other issues where you consulted
21 with him?

22 A It was primarily about the follow up to the
23 surgery on my leg, but he also wrote important information
24 so I could get EDD benefits.

25 Q Can you tell me the different medical facilities

1 that you have visited?

2 A I have seen an optometrist, through a referral
3 from my primary care physician. And I've also seen a
4 dermatologist within these past few months.

5 Q So would you say that was maybe start of January
6 of this year? Or what would be the time frame?

7 A I first saw my dermatologist some time in 2025,
8 possibly in April, but I don't remember specifically.

9 I saw my optometrist for the first time in
10 September of 2025, I believe for the first time.

11 Q And who is the optometrist that you visited? Do
12 you recall the name?

13 A The optometrist is Dr. Sylvia Chang.

14 Q And do you know the address of Dr. Chang?

15 A I don't know the address off the top of my head,
16 but I believe it's on Hayden Avenue in Rancho Cucamonga.

17 Q And can you tell me the dermatologist's name?

18 A The first dermatologist I saw was Dr. Coronado,
19 but the doctor has changed. And his first name is Ryan,
20 but I can't remember his last name off the top of my head.

21 Q For Dr. Coronado, do you recall his first name?

22 A No, I don't. I have these on my phone if you
23 need direct names.

24 Q Yeah, if that is possible, I think that would be
25 helpful, if it's something that you could access easy.

1 A The first dermatologist was Dr. Felipe Coronado.

2 Q Do you happen to know his address?

3 A The second doctor is Dr. Ryan Donlon;
4 D-O-N-L-O-N. I do not see the address here, but I know
5 it's in this text message chain somewhere.

6 Q Or even the city would be helpful.

7 A The street is Sierra Lakes Parkway, but I don't
8 have a number for it. It's in Fontana California.

9 Q Just to clarify: That's for Ryan Donlon; is that
10 correct?

11 A They both were in the same building.

12 Q The same building. Okay.

13 For the optometrist, is there a specific reason
14 you were referred there?

15 A I have cataracts in my right eye, and there is
16 supposed to be surgery later on this year, but a date has
17 not been sent yet.

18 Q And for dermatologist, is there a specific reason
19 why you sought treatment?

20 A I have a rare skin condition called prurigo
21 nodularis. I have open lesions on my arms and other parts
22 of my body because of that.

23 Q And so besides the doctors that you've mentioned,
24 were there any other medical facilities that you visited?

25 A The only other doctor I've seen is Dr. Bouz;

1 B-O-U-Z, who is the QME who saw me, I believe on
2 February 13 of this year.

3 Q So besides the injuries that we're here for that
4 you're claiming you suffered at Staffmart, have you had
5 any other accidents or injuries within the last 15 years
6 that's required you to get medical treatment?

7 A I've not had other injuries, but I did go to
8 urgent care in 2019 when I first got my skin condition,
9 which I did not know at the time was prurigo nodularis.

10 Q Do you recall the name and the location of that
11 urgent care?

12 A Ironically, it's in the same building where my
13 primary care physician is, at 7777 Milliken Avenue.

14 And they initially said I had a staph infection.

15 Q Have you ever had to stay at a hospital overnight
16 within the last 15 years?

17 A The only time I had to stay at a hospital, since
18 I was born, overnight was when I had my surgery. And I
19 stayed at St. Bernardine Medical Center from October 1
20 until late October of 2024.

21 Q That was for your leg surgery; is that correct?

22 A Yes. I had three leg surgeries in October of
23 2024.

24 Q Did you say it was called St. Bernstein's?
25 If you could repeat.

1 A St. Bernardine Medical Center. It's run by
2 Dignity Health.

3 It's spelled B-E -- I don't know the spelling off
4 the top of my head.

5 MR. DARDASHTI: It's St. Bernardine. It does not
6 have an "S."

7 The defendant employer is Staffmark; it's not
8 Staffmart.

9 BY MS. CHOI:

10 Q Have you suffered any prior, like, broken bones?

11 A I've never had a broken bone in my life, up until
12 the surgery on my leg.

13 Q So the surgery was not a result of broken bone?

14 A The surgery was not the result of a broken bone.
15 Correct.

16 Q Have you ever been diagnosed by any doctor with
17 any kind of arthritis condition?

18 A No.

19 Q How about thyroid condition?

20 A No.

21 Q Bone problems or any spinal problems?

22 A No.

23 MR. DARDASHTI: Hold on, I'm just going to
24 object. It's vague as to time and scope.

25 Counsel, are you asking prior to the QME visit?

1 MS. CHOI: Yes, just in general, prior. If he
2 has a history of any bone problems or spinal problems.

3 MR. DARDASHTI: She's asking you, I believe,
4 outside of this workers' compensation case.

5 MS. CHOI: Yes, that's correct.

6 THE WITNESS: No, I have not had any issues with
7 that.

8 BY MS. CHOI:

9 Q Have you ever been on disability in the past?

10 MR. DARDASHTI: Just objecting regarding time and
11 scope and vagueness.

12 Counsel, is there a time limit or just any time
13 preceding today?

14 MS. CHOI: Is that in regards to my question
15 regarding disability?

16 MR. DARDASHTI: Yes.

17 MS. CHOI: Just any time.

18 THE WITNESS: Yes. I received SSI benefits from
19 20- -- 2002 until 2014.

20 BY MS. CHOI:

21 Q So just to clarify: From 2002 to 2014; is that
22 correct?

23 A Yes.

24 Q Is there a specific reason why you were receiving
25 SSI payments?

1 A I was diagnosed with bipolar disorder.

2 Q Besides your surgery on your leg, have you had
3 any other surgeries in your lifetime?

4 A Besides on my leg, I have not had any other
5 surgeries.

6 MR. DARDASHTI: And then, Counsel, just for
7 clarification for Volume I. Very briefly.

8 Sir, you gave a date of 2002 just a moment ago to
9 defense counsel; is that correct?

10 THE WITNESS: 2002; correct.

11 MR. DARDASHTI: Did anything else significant
12 happen that you could recall around 2002?

13 THE WITNESS: In 2002, my mother passed away.

14 MR. DARDASHTI: Okay. Do you recall reviewing
15 the deposition transcript from Volume I?

16 THE WITNESS: Yes, I did review that.

17 MR. DARDASHTI: Do you believe there may have
18 been a clerical error with respect to when your mom passed
19 away?

20 THE WITNESS: Yes.

21 MR. DARDASHTI: So is the proper date on or about
22 the year 20 -- I'm sorry. 2002, which would be the year
23 that your mom passed away?

24 THE WITNESS: There was a clerical error that
25 said she passed away in 2022. Which is 20 years later.

1 MR. DARDASHTI: Thank you.

2 MS. CHOI: Thank you.

3 BY MS. CHOI:

4 Q Have you ever been diagnosed with high blood
5 pressure or diabetes?

6 A Not before my surgery in October of 2024.

7 Q Just to clarify: Prior to 2024, you were not --
8 you were not aware of high blood pressure or diabetes; is
9 that correct?

10 A That is correct.

11 Q So what medications are you currently taking for
12 high blood pressure?

13 A To the best of my knowledge, I still don't have
14 high blood pressure. Although the last time I met with
15 Dr. Fakeh, he said it was getting high, but it did not
16 exceed the level that he would recommend anything about
17 it.

18 Q Thank you. You do have diabetes; is that
19 correct?

20 A I have type 2 diabetes.

21 Q What medications are you taking for that?

22 A I take 2 milligrams of Ozempic once a week. I
23 take Jardiance once a day. I take Metformin twice a day.

24 And these are the three main medications for the
25 diabetes specifically.

1 Q Have any of your family members ever been
2 diagnosed with high blood pressure or diabetes?

3 A My dad was diagnosed with diabetes. But as far
4 as high blood pressure, not to the best of my knowledge
5 anyone in my family.

6 Q Are you currently working?

7 A No.

8 Q When was the last day that you worked?

9 A The last day I was physically in the warehouse
10 was August 30, 2024.

11 Q Was that with Staffmark or Mobus?

12 A I was a Mobus employee at that time.

13 Q Where was it located?

14 A The Mobus warehouse is in Ontario, California, on
15 Rochester. I believe 1900 Rochester Avenue.

16 Q Why did you stop working?

17 A I never have been technically released from my
18 job. I was placed on a leave-of-absence upon having this
19 condition with my foot.

20 I called in sick right after Labor Day, and hired
21 the injury attorneys from Dash & Port. A month after that
22 is when I checked myself in to the emergency room because
23 my foot got worse. And I had my surgeries at that time.

24 I was placed on leave of absence, and technically
25 my employment is still indefinite. To the best of my

1 knowledge.

2 Q So you said your last day at work, that you
3 actually worked, was August 30, '24. So after that you
4 went on a leave of absence; is that correct?

5 A Yes.

6 Q That was due to your health condition?

7 A Yes.

8 Q Are you currently looking for work?

9 A No. But I spoke to my attorney about this, and
10 it has to do with these proceedings and recommendations
11 from him.

12 Q So what is your current source of income?

13 A I received EDD payments for a few months in 2025.
14 And at some point, Liberty Mutual started sending biweekly
15 checks, I believe from April until October 21, 2025.

16 I accumulated savings, and I've lived off those
17 saving up until recently. And my savings have dwindled to
18 the point that I'm concerned about it.

19 Q So for EDD payments, you say you received for
20 several months in 2025. What was the payment amount and
21 how frequently did you receive them?

22 A The award was roughly 575 per week.

23 It lasted until Liberty Mutual took over biweekly
24 payments. The biweekly payments were 527 per week, for a
25 total of 1,054 per installment -- or deposit into my bank

1 account.

2 MR. DARDASHTI: To be clear: How many months
3 would you estimate Liberty Mutual paid you for?

4 THE WITNESS: I believe the payments happened
5 from April 2025, and specifically I remember that it's
6 October 21, 2025, when they stopped.

7 BY MS. CHOI:

8 Q Are you currently receiving any social security
9 disability checks?

10 A No.

11 Q Have you ever been involved in any automobile
12 accidents before?

13 A I believe it was 2022 that there's an incident on
14 my record where there was a slight collision with
15 sheriff's cruiser in the middle of an intersection when he
16 was in pursuit. It did no damage whatsoever to my car,
17 and it clipped their rear fender. And I believe they
18 issued a claim against my insurance company.

19 Q You were not injured in this accident?

20 A I was not injured. Not at all.

21 Q And were there any other auto accidents?

22 A In 1994, I had an auto accident in March where I
23 crashed a 1966 Ford Mustang.

24 Q Were you injured due to this accident?

25 A No, I was not.

1 Q You didn't receive any medical attention or
2 treatment out of this accident?

3 A There was no injury. So no, I did not receive
4 any medical treatment.

5 Q Have you ever been injured in any kind of
6 slip-and-fall accident?

7 A No.

8 Q Have you ever had any other workers' compensation
9 claims or lawsuits besides the current one with Staffmark?

10 A I have none.

11 Q When did you begin working for Staffmark?

12 A In the autumn of 2016. I believe in September.

13 Q September. Okay.

14 Which location was that at?

15 A I got my job through the Fontana office on Clover
16 Avenue.

17 Q What was your job position at that time?

18 A They put me on an assignment at a Living Spaces
19 warehouse where I drove a cherry picker, also called an
20 order picker.

21 Q Were you working full time or part time?

22 A I was working full time, with a lot of overtime.

23 Q At that time how much was your pay, whether it's
24 hourly or weekly?

25 A I believe I was making \$12 per hour that the

1 time.

2 Q If you could just briefly describe, like, what
3 job duties came as an order picker.

4 A At Living Spaces, it's a furniture warehouse. So
5 I was responsible for retrieving couches and tables and
6 whatever you might find inside Living Spaces from very
7 high elevations, maybe 30 feet in the air.

8 I was working usually six days a week, 11 hours a
9 day. And this was a seasonal job, prepping for the
10 Christmas holiday season.

11 Q So you said you started working here in August --
12 I guess September of 2016. When was the last day with
13 this job position?

14 A It was right around Christmas in 2016.

15 Q Do you recall your name of your supervisor at
16 that time?

17 A Robert Brown.

18 Q What was the reason for stopping work in this job
19 position?

20 A It was a seasonal job.

21 Q Seasonal job. Okay.

22 So after this job position, what was your next
23 job?

24 A Once again, through same office in Fontana,
25 Staffmark. I got a job at Tech Data starting in early

1 January of 2017.

2 Q Just to clarify: Your job position was Tech
3 Data? Or was there any other name for that?

4 A I believe the full name of the company is Tech
5 Data Logistics.

6 Q What was your job position?

7 A Usually on my resume, for all of my warehouse
8 job, I put it at PTI operator, which stands for powered
9 industrial truck. Actually PIT operator; powered
10 industrial truck.

11 Most jobs require that I operate multiple powered
12 industrial equipment.

13 Q So moving onto the job duties.

14 Besides operating powered equipment, can you just
15 give me a brief description of your job duties?

16 A I have loaded trucks. I have unloaded trucks. I
17 have helped with inventory. I've helped with quality
18 controls. I have received products. I have shipped
19 products.

20 And besides the powered industrial trucks, I have
21 assisted with delegation of labor at times.

22 And just other general duties, but those are the
23 main ones.

24 Q And approximately how many hours did you work per
25 week?

1 A Most of my jobs are 40 hours per week. During
2 the holiday season, I try to have jobs that emphasize
3 overtime, so I could pay for the holidays. But most of my
4 jobs are 40 hours per week.

5 Q In this job position, how much did you earn per
6 hour?

7 A I believe Tech Data was in the \$13 range, but I
8 don't remember that one off the top of my head.

9 Q How long did you work there until?

10 A I believe I worked at Tech Data until September
11 of 2017.

12 Q What was the reason for you leaving the
13 employment?

14 A It might have been to get another job. I have
15 all my resume information on my phone, if you want me to
16 access specific dates and the reasons and the supervisors.

17 My supervisor at Tech Data was Joe Rivas.

18 Q After September of 2017 were you still with
19 Staffmark? For another job?

20 A Since I started working for Staffmark in 2016, I
21 believe I've been on 12 different Staffmark assignments.

22 One of them was at the same place for different
23 years, at Shark Ninja, so I don't know if that counts as
24 one or two assignments. But I've been on about 11 or 12
25 different assignments through Staffmark.

1 Q And so for all of those different assignments,
2 was it typically -- like your job position was the PIT
3 operator or something similar to that?

4 A A hundred percent of the time, I was operating a
5 powered industrial truck.

6 There's actually one exception that I can think
7 of it in Washington State where my only job was unloading
8 trucks during the Christmas season at Yusenn Logistics.
9 Y-U-S-E-N-N.

10 It was also a Target warehouse, Yusenn was
11 operating Target warehouse.

12 Q When did you start working with Mobus Parts
13 America?

14 I mean, I believe you were with Staffmark first,
15 and then working at Mobus. When was that?

16 A I started working through Staffmark at Mobus on
17 March 26, 2024. And I believe my first day as a Mobus
18 employee from Staffmark was on August 12 or 13 of 2024.

19 Q With Mobus, what was your job position?

20 A Material processor.

21 This was another typo, by the way, in my prior
22 deposition where they said it was material process. If
23 that matters.

24 Q Did that also involve being a forklift dryer?

25 A Yes, it did. But it wasn't my primary duty that

1 I did all day, nonstop. It's something I did on occasion,
2 but it was a very important part of the job.

3 Q Can you just give me a brief description of what
4 you did as material processor on a daily basis?

5 A Auto parts come in in large crates with large
6 cardboard boxes around them. And my job as a material
7 processor was to scan a label, open up the box and take
8 the auto parts out of it, and to separate them onto
9 different carts. That was the main duty.

10 But I also had to unstack boxes from on top of
11 each other, using a reach. And I also had to put away the
12 products at the end of the day, using a stock chaser.

13 Q Can you just tell me a little bit more about how
14 you use the reach and stack chaser?

15 A Throughout the day, there are different people in
16 the department where I was at and most of them on the
17 equipment are loading trucks. So they would assist us
18 whenever we would finish one box and we would need
19 another, by taking their equipment to put on a new pallet
20 full of auto products.

21 But now and then they were too busy, so one of us
22 material processors would have to do it ourselves. So
23 that's an instance of when I would be on a reach or a
24 stand-up forklift.

25 At the end of the day, there would be an emphasis

1 to take the things that we had on the carts and for us to
2 drive a stock chaser to put the merchandise away into
3 locations.

4 Q Did that involve, like, personally and physically
5 lifting the boxes yourselves? Like, throughout your, I
6 guess your job duties, did you have to lift anything
7 physically by your self?

8 A There were very -- yes, there were very heavy
9 objects often in the boxes. The heaviest were
10 transmissions. There were times where products would
11 weigh as much as 115 pounds, in which case we would have a
12 team lift, but there were very heavy objects. There were
13 also very light objects, which were plastic covers for
14 lights, et cetera.

15 But a good deal of what I was lifting was in
16 range of 30 to 50 pounds on a regular basis.

17 Q Did you work full time or part time?

18 A For the entire time I was at Mobus, I definitely
19 worked full time, very often between ten and 11 days -- or
20 hours per day. And very often on Saturdays as well, five
21 hours per day.

22 Q How much did you earn per hour?

23 A I believe my wage was \$20.65 per hour, but that's
24 off the top of my head.

25 Q What was the name of your supervisor?

1 A My main supervisor was Will, and I don't know his
2 last name off the top of my head.

3 Q While you were working these positions, were you
4 ever, like, reprimanded, suspended or issued a warning for
5 anything?

6 A No. Actually I believe one time he wanted me to
7 acknowledge putting products in the wrong location. And I
8 believe I disputed it, and showed him that whatever I put
9 in location was put there by error.

10 I can't remember the complete circumstances. But
11 there was one time when he wanted to write me up for
12 something, but I successfully challenged whatever he
13 wanted me to accept had happened.

14 Q And also while you were employed with Staffmark
15 or Mobus, did you have any other employment at that time?

16 A No.

17 MS. CHOI: If we could go off the record for a
18 moment.

19 (Whereupon, a break was taken.)

20 MS. CHOI: Back on.

21 BY MS. CHOI:

22 Q Since this is a workers' compensation claim,
23 Mr. Corona, if you could describe to the best of your
24 ability, how you were injured at work.

25 A I start working at the Mobus warehouse in March

1 of 2024. And with any warehouse I've ever worked in,
2 there's ordinary pains that go with it. And I've talked
3 about it in the last deposition, where sometimes I'll even
4 get leg cramps or calf cramps and ordinary soreness.

5 So during the course of working 60 hours a week,
6 there's a lot of ordinary things that happen along those
7 lines. And with my foot, I didn't understand the severity
8 of which direction it's going, and that it would be
9 irreversible.

10 I don't know if that answers your question.

11 But pretty much: When did it start, and when did
12 I first call in sick. That was a few months.

13 And when I called in sick, it's because of the
14 toenail finally was an issue, the toe swelled
15 significantly.

16 Q So besides your foot, was there any other body
17 parts that you felt like it was injured over the course of
18 your employment?

19 A The secondary injuries that I reported to my
20 attorney and to the QME evaluator was -- one of them was
21 to my left knee, and the other one was to my lower back.
22 And a lot of that had to do with the compensation from not
23 being able to put my full weight on my right foot anymore.

24 Q So we'll just go one-by-one. So when you're
25 talking about your foot, it's your right foot? That's

1 correct, right?

2 A Yes, I'm talking about my right foot when I was
3 actually working in the warehouse.

4 Q And when did you start feeling, like, any pain or
5 issues with your foot while you were working?

6 A I called in sick on July 16th and 17th in 2024.
7 A couple of days before that, I noticed swelling on my toe
8 and the swelling got so bad that my toenail was kind of
9 jobbing into my skin. There seemed to be another toenail
10 growing underneath it so the toenail was loose, so I
11 removed the toenail at that point.

12 And I reported that to my manager, Alfred, and I
13 reported it to the Staffmark rep, her name was Alandra.
14 And I send her a picture of my swollen toe.

15 Q You said Alandra?

16 A Alandra, yes.

17 Q Okay. If you could just repeat or clarify: So
18 when was that you reported to your manager and also to
19 Alandra? Which date?

20 A I called in sick two consecutive days, July 16
21 and July 17, from the best of my memory.

22 Q And that was when you let them know?

23 A Yes.

24 Q Did you seek immediately when you couldn't --
25 when you were having pain in your feet, did you seek any

1 medical attention?

2 A I did not seek immediate medical attention.

3 I was in transition from working as a Staffmark
4 employee to working as a Mobus employee. Initially, they
5 had a start date for the very end of July for me as a
6 Mobus employee, but it wound up being in the middle of
7 August, and the reason is unknown why it was pushed back.
8 So I was going to receive new medical insurance with
9 Mobus.

10 And in the meantime, I used over-the-counter
11 medications including Neosporin, rubbing alcohol, hydrogen
12 peroxide, to deal with issues I had on my toe, believing
13 that that would be sufficient for the healing process.

14 Q When was the first time you sought medical
15 attention for your feet?

16 A The first time I went to a clinic was right after
17 Labor Day in 2024. I went to La Conception Medical Clinic
18 in West Covina.

19 Q Is there a specific doctor that you saw when you
20 visited there?

21 A In the last deposition, we also covered this.
22 But the writing on the paper that he gave for my
23 medication was not legible, so I couldn't tell you what
24 his name is. But it was La Conception Medical Clinic in
25 West Covina.

1 Q So when you went to this doctor, what was the
2 treatment or what was -- what was done when you visited
3 the doctor?

4 A That's the first time when I realized that I
5 might have a problem with diabetes, because he took a
6 blood test and said my sugar was high.

7 I'm not sure if it was a blood test, actually it
8 might have been urine, but they tested my blood sugar.

9 And he prescribed -- I believe that's when I had
10 Metformin and Naproxen prescribed for the first time. And
11 there might have been an antibiotic.

12 And it was around that time that I hired Dash &
13 Port Injury Attorneys.

14 And then I saw another doctor in the middle of
15 September, Dr. Russman.

16 Q So what did the doctor specific -- the first
17 doctor that you visited, did they say anything specific
18 your foot and your injury?

19 A I had worked the prior Friday, so I was still
20 able to get around on my foot. Things had got
21 progressively worse with the necrotic skin ulcer on my big
22 toe, and it had spread to my second toe. And the most he
23 could give me off of work a four-day notice.

24 It wasn't until I saw Dr. Russman that she gave
25 me an extension until October 27, 2024.

1 Before that deadline came up, it had progressed
2 significantly worse, and I checked into an ER on
3 October 1.

4 Q So going back. You said you saw Dr. Russman in
5 September 2024.

6 A Yes.

7 Q Do you recall her first name, and where it's
8 located at?

9 A I believe it's Marina Russman, Dr. Marina
10 Russman. I probably have the address on my phone but I'm
11 not positive if I do, if you want me to check.

12 Q Do you recall the city?

13 A West Covina.

14 Q West Covina.

15 When you visited Dr. Russman, what treatment or
16 diagnosis did -- did the doctor give at that time?

17 A The first time I saw Dr. Russman, the skin ulcer
18 on my toe was pretty big at that time, and I don't
19 remember if there was a specific diagnosis.

20 And they also took note that I had complaints
21 about my left knee and my lower back, and they gave me a
22 schedule of therapy sessions.

23 And the first therapy session I went to, they did
24 not offer treatment for my toe and I was surprised by it.
25 Instead, they started treatment on my left knee with some

1 kind of electrical pads, and they were scheduled to do
2 treatments on my lower back once the knee was done. But
3 that never happened because my foot had got worse and I
4 wound up going to ER on October 1, 2024.

5 Q When you went to the ER on October 1, what
6 transpired at the ER?

7 A By that time, I couldn't walk on my foot at all
8 and I bought crutches so I was walking around on crutches.

9 It was my first day that my Mobus health
10 insurance had kicked in, so I went to the emergency room.

11 And they did a CAT scan on my foot eventually.

12 And the next day, I believe that's when I talked
13 to Dr. Fong Dardan for the first time. And he initially
14 wanted me to have the amputation on that day, which was
15 the evening of October 2.

16 But I requested a little longer so that I could
17 talk to my brother and my best friend, whose wife is a
18 nurse.

19 And the amputation was done the following
20 morning, after it was the agreement that it was the best
21 thing medically for me to do.

22 Q So after the amputation, did you continue seeing
23 any, like, medical provider up until now, regarding any
24 treatments or followup?

25 A At the time, I did not have a primary care

1 physician, so Dr. Fong Dardan acted as my primary care
2 physician.

3 But when I got released from St. Bernardine
4 Medical Center, they scheduled a physical therapist to
5 come to my house, and they also scheduled a wound care
6 specialist to come to my house.

7 Q After you've been doing physical therapy -- up
8 until -- have you ever seen any other physicians or, I
9 guess, follow-up, checkups after that?

10 A I saw people that provided my prosthetic foot at
11 Hanger Clinic. They aren't doctors, rather they are
12 specialists in prosthetics.

13 Q You said Hagger Clinic?

14 A Hanger.

15 Q Hanger Clinic. Okay.

16 Where is that located? Do you know?

17 A Redlands, California.

18 Q What was your -- when did you last visit any
19 doctors or -- for your, I guess, injury to your foot? Was
20 that the last time?

21 A I've been seeing my primary care physician since
22 February of 2025, and I see him every three months,
23 primarily to treat the diabetes. I have a referral from
24 him in my car to see a physical therapist, pending how
25 this turns out with this, this workers' comp issue. And

1 whatever I need to do next, in regards to getting back to
2 work, or else getting on SSDI, or whatever my attorney
3 recommends at that point.

4 Q Moving back to the left knee. When did you
5 feel -- start to feel pain and injury to your left knee
6 while working?

7 A It was definitely in August of 2024. I was
8 working between 10 and 11 hours per day, and as my right
9 foot became more painful to stand on, I had to compensate
10 by putting all my body weight on my left knee. And in a
11 chain reaction, eventually it affected my lower back at
12 the time.

13 Right around the eight-hour mark whenever I was
14 at work, I would notice that it was significant, as far as
15 my pain threshold. And there was times when I was
16 wondering if I could get through my shift in the last week
17 or two that I was at Mobus.

18 Q So both your left knee and back pain started
19 right when you were having issues with your foot.

20 So it was probably all around August 2024; is
21 that correct?

22 A Yes. Like I said, I first called in sick in the
23 middle of July. My foot became worse. And definitely by
24 August of 2024, all three were in pain.

25 Q And so for your left knee and lower back, you

1 were being seen by the same doctors for your foot; is that
2 correct?

3 A For my left knee, I was seeing Dr. Marina Russman
4 in September of 2024. And I haven't seen her since I went
5 to St. Bernardine to get my surgeries.

6 Q Can you spell that name for me again? The
7 doctor's name?

8 A I believe it's Marina Russman.

9 Q Marina, okay.

10 A Russman; R-U-S-S-M-A-N, is the way I remember it.

11 Q So at that time, September 2024, you saw
12 Dr. Russman for your left knee. And did they give -- did
13 she give any, like, diagnosis or treatment plans for your
14 knee?

15 A Yes. I was going to physical therapy for about
16 two or three weeks from the middle of September up until
17 the time I went to ER in October. I was going on Monday
18 and Wednesday every week, up until that point.

19 Q After that, you haven't been seen for your knee?

20 A No, I have not seen any doctor for my knee.
21 Except for the QME.

22 Q How is your knee doing now? Like, what would you
23 say your pain is like? Like if you were to rate it from
24 1 to 10?

25 MR. DARDASHTI: I'm going to go ahead and object.

1 That is vague and ambiguous as to time and scope.

2 And you could do your best to answer though if
3 you understand.

4 THE WITNESS: Okay. What I told the QME is now
5 that I can't use my right leg and my right foot in the
6 same way, I have a prosthetic foot, my left knee, even
7 now, I have to compensate with.

8 I take a shower with the walker inside the
9 shower.

10 And when I'm in the bathroom, I'm having to lift
11 and lower myself with one leg onto the toilet seat when I
12 need to use the restroom. I.

13 Shave on one leg.

14 And I would say because they ask on a scale of 1
15 to 10, it's no less than a 6 or 7 when it is at it worse.

16 When I was actually working at the warehouse,
17 this would be persistent for hours. But now that I'm not
18 working in the warehouse, it's periodic but it's not
19 sustained.

20 BY MS. CHOI:

21 Q Moving onto your lower back. Did you also see
22 Marina Russman for that, or did you see someone else?

23 A That was Marina Russman as well.

24 But it never got around to physical therapy for
25 my back. That was scheduled for a later time.

1 Q You were never seen afterwards for your lower
2 back after that with Marina Russman; is that correct?

3 A That's correct.

4 Q And so prior to your work with Staffmark or
5 Mobus, at the time period of March 26, 2024, did you have
6 any other, like, pain or injuries issues to your foot,
7 knee or the -- or your lower back?

8 A Nothing significant.

9 In the last deposition, I mentioned that in my
10 first warehouse job back in 1990, when I worked for Quill
11 Corporation, I had a pinched nerve in my back which did
12 not last for more than a week, as far as any pain. It's
13 pretty much taken care with muscle relaxer.

14 And that's in the last deposition that I gave
15 last year.

16 Q And what was the time period for that? Like a
17 date?

18 A It happened so long ago, that I can't remember
19 the specific year. But I think it was 1990, maybe 1991.

20 MS. CHOI: I think that is all of the questions
21 for today. So I think that concludes the deposition.

22 MR. DARDASHTI: Okay, I have a few questions.
23 I ask that we go off record for a moment.

24 MS. CHOI: Sure.

25 (Whereupon, a break was taken.)

CROSS-EXAMINATION

BY MR. DARDASHTI:

Q Sir, you testified that you're wearing a prosthetic due to the surgeries and needing one.

Was that prescribed by a doctor, the prosthetic?

A Yes.

Q How long have you been using it?

A Since the end of January of 2025.

Q Did they -- or has the physician or any physician told you approximately how long the prosthetic lasts? As an estimate?

A Once per year is what they recommend. And I've had it for more than a year.

But I did not get it renewed because my pay is \$800, I pay 10 percent of what it costs. Understanding it costs 8,000; I have to pay 10 percent, which is 800.

I don't have that money right now.

Q And so at least annually -- initially they want you to go get checked out for replacement?

A Yes.

Q And the estimate is about \$8,000 in costs?

A Their cost, yeah. My cost; 800. 10 percent.

Q And I know it's in the records but for clarification purposes. The amputation is just right below the knee; is that correct?

1 A Yes, it is.

2 Q Which knee is that?

3 A The right knee.

4 Q And you discussed a bit about problems with your
5 left lower extremity as well; correct?

6 A Initially it's my knee and my lower back, which I
7 discussed with you.

8 Right when I stopped working at Mobus, I talked
9 with Dr. Bouz about issues I'm having with my left foot
10 now as well. And I can make it pop if you want,
11 because -- can you hear that?

12 Q Yes.

13 A My foot is popping on a regular basis. This did
14 not happen before.

15 Q And you spoke with Dr. -- rather, the QME a bit
16 about your work duties and the activities you did at the
17 defendant employer; is that correct?

18 A Yes, I talked to him about my activities at work.

19 Q And you gave some information regarding what
20 physical duties you had and completed; is that correct?

21 A Yes, I did.

22 Q And we touched on this the first time around,
23 regarding some of your duties.

24 Can you give us some further examples about some
25 of the duties that you had, regarding activities with your

1 right foot that has since been amputated?

2 A It's not just me not being able to put full
3 pressure in the same way, which would have to do with
4 carrying things. It's also dexterity. I can't drive
5 power equipment anymore because of dexterity.

6 Q Correct. No, I understand that.

7 But what my question is, prompting you to advise
8 us, is what activities you were doing prior the
9 amputation, leading up to the amputation. And
10 specifically what physical activities you were doing that
11 led to a gradual onset of pain, as well as problems --

12 A Yes.

13 Q -- in your right foot and toe area?

14 A Well, more than most jobs, this job at Mobus
15 required me to actually be on my feet a higher percentage
16 of the day.

17 I'm constantly leaning over, going back.

18 Obviously I sweat, it's not just from my head or
19 upper body, it's also down in my feet. And having a
20 soaked sock for as long as I was having it, ten hours a
21 day for a few weeks after it initially swelled up; I don't
22 think that did any good to the infection. I think it
23 compounded a problem.

24 In retrospect, of course I would have quit the
25 job if I had to, knowing how things turned out.

1 But at that time, I thought I could tough it out
2 and things would get better, especially you know, once my
3 medical insurance kicked in through Mobus.

4 But being on my feet ten hours a day obviously
5 did something to my foot that if I was sitting half the
6 day, you know, it would have been different.

7 Q Can you give some examples of what sort of things
8 you were doing on your feet or your foot? And some
9 mechanisms of some activities that you were doing on your
10 feet, and certain tasks that you believe were repetitive
11 and arduous?

12 A It's not only standing, but moving around my work
13 area. Which includes taking items out of a crate, moving
14 them to the cart behind me, walking 50 feet away to get a
15 scanner.

16 It's not standing in the same location; it's
17 moving around.

18 Q Are you constantly bending your foot and toes
19 when you are walking --

20 A Yes.

21 Q -- and it may be obvious, but I have to ask you.

22 A Yes. I'm constantly crouching, I'm constantly
23 climbing on top of pallets to get to another product.
24 It's not flatfooted all day, in the slightest. It's me
25 leaning over, it's me stepping over items, et cetera.

1 But it's not a job where I stand still; it's a
2 job where I'm always moving and not sitting down.

3 Q And did your pain and the swelling in your foot
4 and toe with infection, did that progressively get worse
5 and worse?

6 A Yes, it did.

7 And I want to mention something specifically,
8 because I can't remember if it is in the deposition, but I
9 don't remember seeing it in there, is my supervisor, Will.
10 We did talk about him in the last deposition.

11 But roughly a week after I called in sick, I had
12 told him on a Monday that I can work on Saturday.

13 By Friday, my foot had got a lot worse. I
14 thought maybe I had athletes foot, because I looked it up
15 on WebMD-type of website, because my foot smelled like a
16 dead bird. And that's the way I explained it to Will.

17 And I asked him, he was about maybe 15 feet away
18 from me as we plugged in our equipment. I said, Will, can
19 please smell my foot, it smells like a dead bird.

20 I was trying to get out of working the next day,
21 Saturday, which had been voluntarily, but I had committed
22 on a Monday a few days before.

23 Q One moment. This discussion you had with Will,
24 it was already after you had felt the pain, and it was
25 already after you had discussed and expressed the pain to

1 your employer before; correct?

2 A Yes.

3 Q And it was already after you tried to tough it
4 out. But you still didn't get out of work, you kept
5 working with the pain as it progressed, and got worse and
6 worse; is that correct?

7 A Yes. I worked with the pain. And in the last
8 deposition I explained that I was taking more ibuprofen
9 because of this.

10 Q Do you feel you were desperate at this point?

11 A Exactly.

12 MR. DARDASHTI: Understood. All right.

13 At this point, I don't have any further
14 questions.

15 I believe counsel of Hanna Brophy, I had asked
16 her if she had any further questions, just want to ensure
17 and maintain -- Counsel, you have no further question?

18 MS. JONES: I have no further questions.

19 MR. DARDASHTI: Other counsel, you have no other
20 questions, Ms. Choi?

21 MS. CHOI: No other questions, thank you.

22 I could go ahead and include my stipulations now
23 if no one has any further questions.

24 MR. DARDASHTI: You can -- you can try.

25 MS. CHOI: Counsel, can we stipulate that the

1 court reporter will be relieved of her obligations.

2 That the original of the deposition transcript be
3 sent to the applicant's attorney's office for the
4 applicant to sign under penalty of perjury. And
5 applicant's counsel will notify my office within 40 days
6 of the receipt of the transcript and applicant signature
7 thereto, and any changes he has made to his testimony.

8 In the event that this notification is not
9 received within that period of time, or in the event that
10 the original deposition transcript is unavailable at time
11 of trial or any other proceeding in which it was required,
12 a certified copy may be treated as if it were a signed
13 original.

14 Do you stipulate?

15 MR. DARDASHTI: No, we can't agree to that
16 because we can't relieve the court reporter of her
17 custodial duties at this time.

18 What I would propose is that we proceed pursuant
19 to code.

20 We would request that the deposition officer or
21 her agency provide our office with an electronic certified
22 copy which should be e-mailed to info@dashandport.com.
23 All spelled out, no ampersand.

24 We would request that the deposition officer
25 kindly obtain the e-mail address of the deponent, my

1 client, as soon as we adjourn momentarily.

2 That the original deposition transcript or
3 readiness will be notified upon the deponent. He'll have
4 30 days to make any changes or execute under the penalty
5 of perjury.

6 Should those 30 days lapse, then the deposition
7 officer or her agency will notify the parties, and the
8 original deposition transcript will be transmitted to the
9 noticing party -- that would be your office in this case,
10 Ms. Choi -- the defense counsel, for safekeeping and
11 custody, thereby relieving the -- Madam Reporter of her
12 custodial duties under the code.

13 We can agree, again, pursuant to the code that in
14 the unlikely event that the original deposition transcript
15 is lost, destroyed or unavailable at the time of trial,
16 then a certified, unsigned electronic copy can be used in
17 lieu thereof for all WCAB proceedings.

18 Can we agree to that?

19 MS. CHOI: So stipulated.

20 MS. JONES: Yes. I would like a copy sent to
21 mail@hannabrophy.com. I included my e-mail in the comment
22 box, the chat box.

23 (Whereupon proceedings concluded at 12:36 P.M.)
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I, EDWARD CORONA, hereby declare under penalty of perjury that I have read the foregoing transcript. Corrections, if any, were noted in ink, and the same is now a full, true and correct transcript of my testimony.

Executed this _____ day of _____, 2026, at _____, California.

EDWARD CORONA

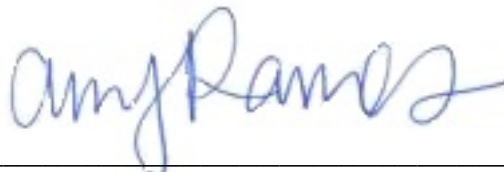
REPORTER'S CERTIFICATE

I, AMY RAMOS, a Certified Shorthand Reporter No. 13311 in the State of California, do hereby certify:

That the foregoing proceedings were taken before me; that any witnesses in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 3rd day of April, 2026.



AMY RAMOS
CSR No. 13311