



**SIMAS & ASSOCIATES**  
L T D

GOVERNMENT AND ADMINISTRATIVE LAW

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**FACSIMILE TRANSMISSION**

**TUESDAY, JANUARY 19, 2018**

**FAX RECEIVED**  
JUL 02 2018  
DWG/LEGAL UNIT  
DEPARTMENT OF INDUSTRIAL RELATIONS

	NAME	FAX NO.	PHONE
<b>To:</b>	GEORGE PARISOTTO . DIVISION OF WORKERS COMPENSATION	510-286-0687	
<b>FROM:</b>	TRACY L MONASTERIO ADMINISTRATIVE ASSISTANT SIMAS & ASSOCIATES, LTD. SACRAMENTO OFFICE	(916) 789-9801	(916) 789-9800
<b>RE:</b>	RE: Hoang Mai Thi Vu		
<b>NUMBER OF PAGES:</b> (WITH COVER SHEET)		<b>ORIGINAL TO FOLLOW: VIA USPS</b>	
THANK YOU.			

**NOTICE OF CONFIDENTIALITY:** THE STATEMENTS UPON AND ANY DOCUMENTS INCLUDED IN THIS FACSIMILE TRANSMITTAL SHEET CONTAIN INFORMATION THAT IS CONFIDENTIAL, PRIVILEGED AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. THIS INFORMATION IS INTENDED TO BE FOR THE EXCLUSIVE USE OF THE NAMED ADDRESSEE. IF YOU ARE NOT THE ADDRESSEE, NOTE THAT ANY DISCLOSURE, COPYING, DISTRIBUTION, OR USE OF THE CONTENTS OF THIS TRANSMITTAL IS PROHIBITED. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE NOTIFY US AT 916-789-9800 (COLLECT) SO THAT WE CAN ARRANGE FOR THE RETRIEVAL OF THE ORIGINAL DOCUMENTS AT NO COST TO YOU. THANK YOU.

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Steven L. Simas  
Daniel J. Tatick  
Michael J. Bridge

TELEPHONE  
916.789.9800

FACSIMILE  
916.789.9801

—Of Counsel—  
Heather F.C. Hoganson

SACRAMENTO  
SAN DIEGO  
SAN JOSE  
SAN LUIS OBISPO

July 2, 2018

George Parisotto  
Administrative Director  
Division of Workers' Compensation  
Legal Unit  
1515 Clay Street, Suite 1700  
Oakland, California 94612

VIA FACSIMILE AND U.S. MAIL  
510.286.0687



Hearing Request  
Administrative Director  
Division of Workers' Compensation  
1515 Clay Street, Suite 1800  
Oakland, California 94612

VIA U.S. MAIL

Hearing Request  
Office of the Director  
Anti-Fraud Unit  
1515 Clay Street, Suite 1700  
Oakland, California 94612

VIA U.S. MAIL

**Re: *Notice of Provider Suspension*  
Hoang Mai Thi Vu  
Notice of Appeal and Appearance and  
Request for Clarification**

Dear Mr. Parisotto:

This letter is to appeal the Notice of Provider Suspension issued to our client dated June 22, 2018 (see attached). Please note that our client did not receive this letter until approximately June 28, 2018.

George Parisotto  
Administrative Director  
July 2, 2018  
Page 2

### Notice of Appearance of Counsel

Please direct all correspondence to our law firm as Ms. Vu's legal counsel:

Steven L. Simas  
Daniel J. Tatick  
**Simas & Associates, Ltd.**  
3835 N. Freeway Blvd., Suite 228  
Sacramento, California 95834  
Tel. 916.789.9800  
Fax 916.789.9801  
info@simasgovlaw.com

### Request for Clarification

Our client is somewhat puzzled by this Notice of Provider Suspension as she is not presently, nor has been recently, a provider in the workers' compensation system. So we are appealing in part to find this out and to clarify as set forth below.

### Grounds for Appeal

We have two main grounds for appeal:

1. Labor Code section 139.21(a)(1) provides that the Administrative Director suspends a licensee/provider when their license is suspended or revoked. In this case, Ms. Vu's licensing action by the Board of Vocational Nursing and Psychiatric Technicians as the result of a *Default Decision* pursuant to Government Code section 11520 which is not addressed by the Labor Code.
2. As the suspension is premised upon the Board of Vocational Nursing and Psychiatric Technicians' default decision, the decision should be modified and limited only to her practice as a licensed vocational nurse and not any other license. In other words, she should be able to continue to serve as a provide as a registered nurse.

George Parisotto  
Administrative Director  
July 2, 2018  
Page 3

### Supplemental Information

Given the tight timeframe to appeal, we request additional time to present supplemental information until **July 11, 2018**.

Thank you for your consideration and we look forward to your response. Please contact me or our Paralegal Virginia Lambing (vlambing@simasgovlaw.com) if you have any questions.

Sincerely,



Steven L. Simas  
Simas & Associates, Ltd.

SLS:ms

cc: Hoang Mai Thi Vu (via e-mail)  
Daniel Tatick, Esq. (via e-mail)  
Virginia Lambing, Paralegal (via e-mail)

**PROOF OF SERVICE**

**Notice of Provider Suspension – Workers’ Compensation (Hoang Mai Thi Vu)**

The undersigned declares:

I am over the age of eighteen years, not a party to this action, and my business address is 3835 North Freeway Blvd, Suite 228, Sacramento, CA 95834.

On July 2, 2018, I served the following documents:

**July 2, 2018 letter – Hoang Mai Thi Vu: Notice of Appeal and Appearance and Request for Clarification**

on the interested parties in said action by transmitting a true copy thereof addressed as follows in the manner indicated below:

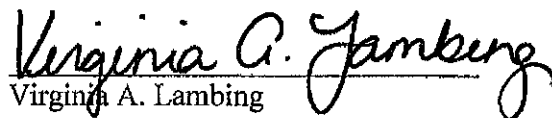
George Parisotto  
Administrative Director  
Division of Workers’ Compensation  
Legal Unit  
1515 Clay Street, Suite 1700  
Oakland, California 94612

Hearing Request  
Administrative Director  
Division of Workes’ Compensation  
1515 Clay Street, Suite 1800  
Oakland, California 94612

Hearing Request  
Office of the Director  
Anti-Fraud Unit  
1515 Clay Street, Suite 1700  
Oakland, California 94612

X **By Mail:** I deposited an envelope(s) with postage thereon fully prepaid to be placed in the United States mail at Sacramento, California. I am familiar with the mail collection practices of the law offices of Simas & Associates, Ltd, and pursuant to those practices the envelope(s) would be deposited with the United States Postal Service the same day.

I declare under penalty of perjury that the foregoing is true and correct; same was executed at Sacramento, California on July 2, 2018.

  
Virginia A. Lambing

## STATE OF CALIFORNIA

EDMUND G. BROWN JR., Governor

DEPARTMENT OF INDUSTRIAL RELATIONS  
DIVISION OF WORKERS' COMPENSATION  
LEGAL UNIT  
1515 Clay Street, Suite 1700  
Oakland, California 94612  
Tel (510) 286-7100 Fax (510) 286-0687



June 22, 2018

Hoang Mai Thi Vu  
335 El Cajon Drive  
San Jose, CA 95111

**NOTICE OF PROVIDER SUSPENSION – WORKERS' COMPENSATION**

Dear Ms. Vu:

The Administrative Director of the Division of Workers' Compensation (DWC) is required by Labor Code section 139.21(a)(1)(C) to suspend you from participation in the California workers' compensation system because your license, certification, or approval to provide health care services has been surrendered or revoked. Enclosed are copies of the documents relied upon by the Administrative Director as the basis for taking this action.

Your suspension will start 30 calendar days after the date of mailing of this notice, unless you submit a written request for a hearing, which will stay the suspension pending the outcome of the hearing. Your request must be made within 10 calendar days of the date of mailing of this notice. If you do not request a hearing within the 10-day time limit, you will be suspended from participation in the California workers' compensation system pursuant to California Code of Regulations, title 8, section 9788.2(b).

Your request for a hearing must contain:

- Your current mailing address;
- The legal and factual reasons as to why you do not believe Labor Code section 139.21(a)(1) is applicable to you; and
- Your original signature or the original signature of your legal representative.

The scope of the hearing is limited to whether or not Labor Code section 139.21(a)(1) is applicable to you. The Administrative Director is required to suspend you unless you provide proof in the hearing that Labor Code section 139.21(a)(1) does not apply.

Your original request for a hearing and one copy of the request must be filed with the Administrative Director. Additionally, you must also serve one copy of the request for a hearing on the DWC Legal Unit. The addresses for the Administrative Director and the Legal Unit are:

Hoang Mai Thi Vu  
June 22, 2018

Hearing Request  
Administrative Director  
Division of Workers' Compensation  
1515 Clay Street, Suite 1800  
Oakland, California 94612

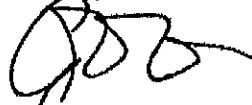
and

Hearing Request  
Department of Industrial Relations  
Officer of the Director  
Anti-Fraud Unit  
1515 Clay Street, Suite 1700  
Oakland, CA 94612

The original and all copies of the request for hearing must have a proof of service attached. A sample proof of service, containing all necessary elements, can be found on the DWC website at <https://www.dir.ca.gov/dwc/forms.html>, under the category "Court Forms," and then "Proof of Service." The Administrative Director is required to hold your hearing within 30 days of the receipt of your written request. The hearing will be conducted by a hearing officer appointed by the Administrative Director. You will be notified shortly after the receipt of your request of the date and time of the hearing.

For more information about the suspension procedure, please refer to Provider Suspension Regulations, California Code of Regulations, title 8, sections 9788.1 - 9788.4, which can be found on the DWC website at <http://www.dir.ca.gov/dwc/DWCPropRegs/Provider-Suspension-Procedure/Clean-Version/Text-of-Regulations.pdf>.

Sincerely,



George Parisotto  
Administrative Director  
Division of Workers' Compensation

Encls:

- Default Decision and Order - *In the Matter of the Accusation Against Hoang Mai Thi Vu* (Case No. 4302017000090), Before the Board of Vocational Nursing and Psychiatric Technicians, California Department of Consumer Affairs
- Accusation - *In the Matter of the Accusation Against Hoang Mai Thi Vu* (Case No. 4302017000090), Before the Board of Vocational Nursing and Psychiatric Technicians, California Department of Consumer Affairs
- Declaration of Socorro Tongco in Support of Notice of Provider Suspension
- Proof of Service

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**BEFORE THE  
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 4302017000090

**HOANG MAI THI VU**  
335 El Cajon Drive  
San Jose, CA 95111  
Vocational Nurse License No. VN 240745

**DEFAULT DECISION AND ORDER**

Respondent, [Gov. Code, §11520]

**FINDINGS OF FACT**

1. On or about December 19, 2016, Complainant Kameka Brown, PhD, MBA, NP, in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians, Department of Consumer Affairs, filed Accusation No. 4302017000090 against Hoang Mai Thi Vu (Respondent) before the Board of Vocational Nursing and Psychiatric Technicians. (Accusation attached as Exhibit A.)

2. On or about March 10, 2009, the Board of Vocational Nursing and Psychiatric Technicians (Board) issued Vocational Nurse License No. VN 240745 to Respondent. The Vocational Nurse License was in full force and effect at all times relevant to the charges brought in Accusation No. 4302017000090 and expired on April 30, 2014.

///

(HOANG MAI THI VU) DEFAULT DECISION & ORDER Case No. 4302017000090



1 3. On or about December 28, 2016, Respondent was served by Certified and First Class  
2 Mail copies of the Accusation No. 4302017000090, Statement to Respondent, Notice of Defense,  
3 Request for Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6,  
4 and 11507.7) at Respondent's address of record which, pursuant to Business and Professions  
5 Code section 136, is required to be reported and maintained with the Board. Respondent's  
6 address of record was and is: 335 El Cajon Drive, San Jose, CA 95111.

7 4. Service of the Accusation was effective as a matter of law under the provisions of  
8 Government Code section 11505, subdivision (c) and/or Business & Professions Code section  
9 124.

10 5. On or about January 25, 2017, the aforementioned documents were returned by the  
11 U.S. Postal Service marked "Return to Sender -- Unable to Forward."

12 6. Government Code section 11506(c) states, in pertinent part:

13 (c) The respondent shall be entitled to a hearing on the merits if the respondent  
14 files a notice of defense . . . and the notice shall be deemed a specific denial of all  
15 parts of the accusation . . . not expressly admitted. Failure to file a notice of defense  
16 shall constitute a waiver of respondent's right to a hearing, but the agency in its  
17 discretion may nevertheless grant a hearing.

18 7. Respondent failed to file a Notice of Defense within 15 days after service upon her of  
19 the Accusation, and therefore waived her right to a hearing on the merits of Accusation No.  
20 4302017000090.

21 8. California Government Code section 11520(a) states, in pertinent part:

22 (a) If the respondent either fails to file a notice of defense . . . or to appear at  
23 the hearing, the agency may take action based upon the respondent's express  
24 admissions or upon other evidence and affidavits may be used as evidence without  
25 any notice to respondent . . . .

26 9. Pursuant to its authority under Government Code section 11520, the Board finds  
27 Respondent is in default. The Board will take action without further hearing and, based on the  
28 relevant evidence contained in the Default Decision Evidence Packet in this matter, as well as  
taking official notice of all the investigatory reports, exhibits and statements contained therein on  
file at the Board's offices regarding the allegations contained in Accusation No. 4302017000090,

1 finds that the charges and allegations in Accusation No. 4302017000090, are separately and  
2 severally, found to be true and correct by clear and convincing evidence.

3 10. Taking official notice of its own internal records, pursuant to Business and  
4 Professions Code section 125.3, it is hereby determined that the reasonable costs for Investigation  
5 and Enforcement is \$962.50 as of February 2, 2017.

6 DETERMINATION OF ISSUES

7 1. Based on the foregoing findings of fact, Respondent Hoang Mai Thi Vu has subjected  
8 her Vocational Nurse License No. VN 240745 to discipline.

9 2. The agency has jurisdiction to adjudicate this case by default.

10 3. The Board of Vocational Nursing and Psychiatric Technicians is authorized to revoke  
11 Respondent's Vocational Nurse License based upon the following violations alleged in the  
12 Accusation which are supported by the evidence contained in the Default Decision Evidence  
13 Packet in this case.:

14 a. Business and Professions Code section 2878.8 (discipline by another state agency).

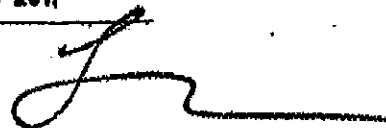
15 ORDER

16 IT IS SO ORDERED that Vocational Nurse License No. VN 240745, issued to Respondent  
17 Hoang Mai Thi Vu, is revoked.

18 Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a  
19 written motion requesting that the Decision be vacated and stating the grounds relied on within  
20 seven (7) days after service of the Decision on Respondent. The agency in its discretion may  
21 vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

22 This Decision shall become effective on MAY 03 2017

23 It is so ORDERED MAR 02 2017

24 

25  
26 FOR THE BOARD OF VOCATIONAL  
27 NURSING AND PSYCHIATRIC TECHNICIANS  
28 DEPARTMENT OF CONSUMER AFFAIRS

# Exhibit A

Accusation

(HOANG MAI THI VU)

**Scanned by CamScanner**

1 KAMALA D. HARRIS  
 Attorney General of California  
 2 DIANN SOKOLOFF  
 Supervising Deputy Attorney General  
 3 KIM M. SETTLES  
 Deputy Attorney General  
 4 State Bar No. 116945  
 1515 Clay Street, 20th Floor  
 5 P.O. Box 70550  
 Oakland, CA 94612-0550  
 6 Telephone: (510) 622-2138  
 Facsimile: (510) 622-2270  
 7 E-mail: kim.settles@doj.ca.gov  
 Attorneys for Complainant

8  
 9 **BEFORE THE**  
**BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against: Case No. VN-4302017000090

12 **HOANG MAI THI VU** ACCUSATION  
 13 335 El Cajon Drive  
 San Jose, CA 95111

14 Vocational Nurse License No. VN 240745  
 15 Respondent.

16  
 17 Complainant alleges:

18 **PARTIES**

19 1. Kameka Brown, PhD, MBA, NP (Complainant) brings this Accusation solely in her  
 20 official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric  
 21 Technicians, Department of Consumer Affairs.

22 2. On or about March 10, 2009, the Board of Vocational Nursing and Psychiatric  
 23 Technicians issued Vocational Nurse License Number VN 240745 to Hoang Mai Thi Vu  
 24 (Respondent). The Vocational Nurse License expired on April 30, 2014.

25 **JURISDICTION**

26 3. This Accusation is brought before the Board of Vocational Nursing and Psychiatric  
 27 Technicians (Board), Department of Consumer Affairs, under the authority of the following laws.  
 28 All section references are to the Business and Professions Code unless otherwise indicated.

(HOANG MAI THI VU) ACCUSATION

1 4. Section 2875 of the Business and Professions Code ("Code") provides, in pertinent  
 2 part, that the Board of Vocational Nursing and Psychiatric Technicians ("Board") may discipline  
 3 the holder of a vocational nurse license for any reason provided in Article 3 (commencing with  
 4 section 2875) of the Vocational Nursing Practice Act.

5 5. Section 118, subdivision (b), of the Code provides that the expiration of a license shall  
 6 not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within  
 7 which the license may be renewed, restored, reissued or reinstated.

8 COST RECOVERY

9 6. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
 10 administrative law judge to direct a licensee found to have committed a violation or violations of  
 11 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
 12 enforcement of the case, with failure of the licensee to comply subjecting the license to now being  
 13 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
 14 included in a stipulated settlement.

15 STATUTORY PROVISION

16 7. Section 2878.8 of the Code states:  
 17 "The board may deny any application or may suspend or revoke any license issued under this  
 18 chapter [the Vocational Nursing Practice Act] based upon the denial of licensure, suspension,  
 19 restriction, or other disciplinary action of a license by another state, any other government agency,  
 20 or by another California health care professional licensing board. A certified copy of the finding  
 21 shall be conclusive evidence of that action provided that, if from another state, the findings  
 22 establish an act which if committed in California would be grounds for discipline."

23 CAUSE FOR DISCIPLINE

24 (Discipline by Another State Agency)

25 8. Respondent has subjected her license to disciplinary action under Code section 2878.8,  
 26 in that on or about May 16, 2016, in a disciplinary action before the Board of Registered Nursing  
 27 ("Board"), case number 2016-529, the Board adopted a stipulated settlement related to  
 28 Respondent's registered nurse license. The stipulation constitutes a record of discipline and

1 Respondent's registered nurse license was revoked, the revocation was stayed, and Respondent's  
2 license was placed on probation for three years, with standards terms and conditions.

3 9. The circumstances of the disciplinary action before the Board of Registered Nursing  
4 are as follows:

5 On or about April, 2014, Respondent was employed as a registered nurse administrator, with  
6 the responsibility to oversee the operation of Elwyn Chablis, a residential adult community care  
7 facility for adults with developmental disabilities, in Livermore, California. On or about April 11,  
8 2014, Patient 1 was discharged from Valley Care Health System with discharge orders that  
9 included a physician's order for a .75 mg Scopolamine patch every 72 hours. The pharmacy  
10 provided a 1.5 Scopolamine patch. Respondent spoke to the discharge nurse and was instructed  
11 to "fold the patch in half." A 1.5 Scopolamine patch was administered to Patient 1 on April 12  
12 and 15, 2014. On April 12, 2015, Patient 1's physician faxed an order to administer a .75  
13 Scopolamine patch to Patient 1, "when available." On April 18, 2014, Patient 1 was admitted to  
14 Valley Care Health System for uncontrolled seizures. On April 25, 2014, a registered nurse  
15 overheard that Patient 1 had been given an incorrect dose of Scopolamine and so informed  
16 Respondent. Respondent admitted that she told everyone to fold the 1.5 mg Scopolamine patch in  
17 half and administer it to Patient 1. Respondent failed to ensure that the Scopolamine was safely  
18 administered to Patient 1. Respondent was charged with gross negligence and incompetence in  
19 violation of Business and Professions Code section 2761, subdivision (a).

20 PRAYER

21 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this  
22 Accusation and that following the hearing, the Board of Vocational Nursing and Psychiatric  
23 Technicians issue a decision:

24 1. Revoking or suspending Vocational Nurse License Number VN 240745, issued to  
25 Hoang Mai Thi Vu;

26 2. Ordering Hoang Mai Thi Vu to pay the Board of Vocational Nursing and Psychiatric  
27 Technicians the reasonable costs of the investigation and enforcement of this case, pursuant to  
28 Business and Professions Code section 125.3;

1 3. Taking such other and further action as deemed necessary and proper.

2 DATED: 12/14/16

3 *[Signature]*  
4 KAMILA BROWN, PhD, MBA, NP  
5 Executive Officer  
6 Board of Vocational Nursing and Psychiatric Technicians  
7 Department of Consumer Affairs  
8 State of California  
9 *Complainant*

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**Declaration of Socorro Tongco  
(in Support of Notice of Provider Suspension)**

I, Socorro Tongco, hereby declare and state as follows:

1. I make this declaration of my own personal knowledge and if called to testify, I could and would testify competently to the matters stated herein.
2. I am employed by the State of California, Department of Industrial Relations ("Department"), Office of the Director, as a Special Investigator. I have been an investigator with the Department since 2006. I make this Declaration in support of the "Notice of Provider Suspension – Workers' Compensation" issued by the Acting Administrative Director of the Division of Workers' Compensation, attached herein.
3. As part of my duties as a Special Investigator, I have access to investigative tools and internet-based information databases such as Thomson Reuters Clear, and LexisNexis Accurant. These database resources provide access to public and non-public records that we use as necessary, for purposes of our legal work and representation of the Department in workers' compensation cases and in other litigation, to locate individuals, uncover assets, and verify identities.
4. On or about June 14, 2018, I noted the address of record for Hoang Mai This Vu with the State of California, Department of Consumer Affairs, Board of Vocational Nursing and Psychiatric Technicians as: 335 El Cajon Drive San Jose, CA 95111.
5. On or about June 14, 2018, I noted the address of record for Hoang Mai Thi Vu with the State of California, Department of Consumer Affairs, Board of Registered Nursing as: 1833 Loch Ness Way San Jose, CA 95121.
6. On or about June 14, 2018, I ran a search on Ms. Vu Lexis Nexis Accurant database. The searches provided the following information: Hoang Mai Thi Vu is associated with an address in San Jose, CA (I will not state the address so as to not reveal Ms. Vu's home address).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 14<sup>th</sup> day of June, 2018, in Oakland, California.

*Socorro Tongco*  
\_\_\_\_\_  
Socorro Tongco



**CERTIFICATE OF SERVICE BY MAIL**  
(C.C.P. section 1013(a), 2015.5)

I am over the age of 18 years and not a party to the entitled action. My business address is 1515 Clay Street, 18<sup>th</sup> Floor, Oakland, California 94612.

I served the following document(s):

- Notice of Provider Suspension – Workers' Compensation
- Default Decision and Order - *In the Matter of the Accusation Against Hoang Mai Thi Vu* (Case No. 4302017000090), Before the Board of Vocational Nursing and Psychiatric Technicians, California Department of Consumer Affairs
- Accusation - *In the Matter of the Accusation Against Hoang Mai Thi Vu* (Case No. 4302017000090), Before the Board of Vocational Nursing and Psychiatric Technicians, California Department of Consumer Affairs
- Declaration of Socorro Tongco in Support of Notice of Provider Suspension

on the following person(s) at the following address(es):

Hoang Mai Thi Vu  
335 El Cajon Drive  
San Jose, CA 95111

Hoang Mai Thi Vu  
1833 Loch Ness Way  
San Jose, CA 95121

Hoang Mai Thi Vu  
640 Lewis Road  
San Jose, CA 95111

The document(s) was/were served by the following means:

(BY U.S. CERTIFIED MAIL) I enclosed the document(s) in a sealed envelope or package addressed to the person(s) at the address(es) listed above and:

Placed the envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with the firm's practice for collection and processing correspondence for mailing. Under that practice, on the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service, in a sealed envelope or package with the postage fully prepaid.

I declare under penalty of perjury under the laws of State of California that the above is true and correct.

Executed on June 22, 2018, at Oakland, California.

  
CATHY FUJITA-LAM



State of California

DEPARTMENT OF INDUSTRIAL RELATIONS  
DIVISION OF WORKERS' COMPENSATION  
1515 CLAY STREET, SUITE 200  
SAN JOSE, CA 95131

Huong Mai Thi Vu  
1833 Loch Ness Way  
San Jose, CA 95121

CERTIFIED MAIL



7037 3360 0000 3961 2024

1833 Loch Ness Way  
San Jose, CA 95121