

October 2, 2023

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

> Re: Sunnyvale Imaging Center, A Professional Medical Corporation Response to Notices of Provider Suspension and Request for Hearing

Dear Mr. Parisotto:

I am responding the notice of provider suspension for Sunnyvale Imaging Center, A Professional Medical Corporation.

The stated basis for the suspension of this entity is that it is controlled by Dr. Shahriar Karimi. But as stated in Dr. Karimi's September 4, 2023, response to the notice of suspension and request for hearing in AD PS-23-20, Dr. Karimi's judicially-dismissed misdemeanor conviction does not involve any qualifying conviction under Labor Code section 139.21, and is not a "conviction" under the statute. Thus, Sunnyvale Imaging Center, A Professional Medical Corporation is not an entity subject to a Labor Code section 139.21, subdivision (a), suspension.

Sunnyvale Imaging Center, A Professional Medical Corporation incorporates Dr. Karimi's September 4, 2023, response and request for hearing in AD PS-23-20, to this objection, and requests a hearing.

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I will accept service of pleadings and correspondence by email: mi@mikimlaw.com.

Thank you.

Very truly yours,

Mi Kim