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7 (COUNSEL CONTINUED ON NEXT PAGE)

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INDUSTRIAL RELATIONS  
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10 **STATE OF CALIFORNIA**  
11 **DEPARTMENT OF INDUSTRIAL RELATIONS**  
12 **DIVISION OF INDUSTRIAL ACCIDENTS**  
13 **WORKER'S COMPENSATION APPEALS BOARD**

13 IDAHIRA YERO, *et al.*; RAFAEL  
VILLAREAL, ROBERT CORONA,

14 *Applicants,*

15 vs.

16 ELITE PERSONNEL and CIGA; SELECT  
17 PERSONNEL SERVICES and CNA  
INSURANCE by INTERCARE INSURANCE  
18 SERVICES,

19 *Defendants.*

20 HARVARD SURGERY CENTER; ROBERT  
21 SCHATZ, M.D.; JOHN RIES, M.D.; PACIFIC  
FAMILY CLINIC; ROBERE MISSIRIAN,  
22 M.D.; CHRISTOPHER CHARBONNETT,  
M.D.; FRANCIS D'AMBROSIO, M.D.; SCOTT  
23 SHAWHAN; DNM PHARMACY, INC.; and  
PREMIER MEDICAL MANAGEMENT,,

24 *Lien Claimants,*

) Case No. VNO 406036; AHM 0093462; POM  
) 0265435

) **DECLARATION OF DAVID WAYNE FISH**  
) **IN SUPPORT OF PETITION TO RESCIND,**  
) **ALTER OR AMEND ORDER OF**  
) **CONSOLIDATION**

) **Labor Code § 5803**

) Date: September 17, 2004  
) Time: 9:00 a.m.  
) Place: 6150 Van Nuys Blvd.  
Room 200  
Van Nuys, CA 91410

) Judge Mark Kahn, Associate Chief Judge,  
Workers' Compensation Administrative  
Law Judge

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1 DECLARATION OF DAVID WAYNE FISH

2 I, David Wayne Fish, declare and state as follows:

3 1. I have personal first-hand knowledge of the facts presented in this declaration and, if called  
4 as a witness, could and would testify competently thereto.

5 2. I am a part owner of Premier Medical Management, Inc. ("Premier"). Premier provides  
6 non-medical business services to Lien Claimants pursuant to a Management Services Agreement.  
7 Among the business services provided by Premier is billing and collection.

8 3. The consolidation orders of June 7 and June 25 encompass over a thousand liens and  
9 involve approximately \$70 million in lien claims.

10 4. The stay orders are causing Lien Claimants and Premier irreparable financial injury. The  
11 stay orders have stopped cash flow on the above liens indefinitely and threaten the very existence of  
12 Lien Claimants and Premier. Other carriers and third party administrators have slowed down lien  
13 resolutions in the hope that CIGA and American will be successful and have advised us that they plan  
14 to move for consolidation and stay of their liens too.

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

17 Executed this 26th day of August, 2004 at Los Angeles, California.

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20 David Wayne Fish  
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