

**S287261**

In the  
**Supreme Court**  
of the  
**State of California**

---

---

**Joseph Mayor,**  
*Petitioner,*

v.

**Workers' Compensation Appeals Board**  
and  
**Ross Valley Sanitation District,**  
*Respondents.*

---

---

COURT OF APPEAL, FIRST APPELLATE DISTRICT, DIVISION FOUR  
CASE NUMBER A169465

---

---

WCAB CASE NUMBER ADJ10036954  
HON. THOMAS J. RUSSELL

---

---

**NOTICE OF ERRATA REGARDING  
NAME OF PETITIONER'S ANSWER BRIEF FILED MARCH 10, 2025**

---

---

Elizabeth Hudson, Esq. (SBN: 161391)  
Shoemaker Law Offices  
150 Glen Cove Marina Rd. E, Ste. 103  
Vallejo, CA 94591  
Telephone (707) 552-1000 / Facsimile: (707) 552-1445  
Email: [beth@shoemakerlawoffices.com](mailto:beth@shoemakerlawoffices.com)

*Attorney for Petitioner, Joseph Mayor*

TO THE CLERK OF THE COURT AND ALL PARTIES:

Please take notice that the Opening Brief on the Merits submitted by Petitioner Joseph Mayor on March 10, 2025 included an incorrect name of the brief.

Attached hereto as **Exhibit A** are copies of the revised pages of the brief to reflect the correct name – “Answer Brief on the Merits.” Aside from the correction of the name of the brief on the cover page, the certificate of compliance, the certificate of service, Petitioner made no other changes to the brief.

Respectfully submitted,

March 11, 2025

/s/ Elizabeth Hudson

Elizabeth Hudson / Shoemaker Law Offices

[beth@shoemakerlawoffices.com](mailto:beth@shoemakerlawoffices.com)

Counsel for Petitioner

## **EXHIBIT A**

S287261

In the  
**Supreme Court**  
of the  
**State of California**

---

---

**Joseph Mayor,**  
*Petitioner,*

v.

**Workers' Compensation Appeals Board**  
and  
**Ross Valley Sanitation District,**  
*Respondents.*

---

---

COURT OF APPEAL, FIRST APPELLATE DISTRICT, DIVISION FOUR  
CASE NUMBER A169465

---

---

WCAB CASE NUMBER ADJ10036954  
HON. THOMAS J. RUSSELL

---

---

**ANSWER BRIEF ON THE MERITS**

---

---

Elizabeth Hudson, Esq. (SBN: 161391)  
Shoemaker Law Offices  
150 Glen Cove Marina Rd. E, Ste. 103  
Vallejo, CA 94591  
Telephone (707) 552-1000 / Facsimile: (707) 552-1445  
Email: [beth@shoemakerlawoffices.com](mailto:beth@shoemakerlawoffices.com)

*Attorney for Petitioner, Joseph Mayor*

## I. CERTIFICATION OF COMPLIANCE

[California Rule of Court 8.204]

I, Elizabeth Hudson, swear that I have read the within ANSWER BRIEF ON THE MERITS and know the contents thereof; that the brief contains 8471 words inclusive of tables, signature blocks, and these certificates, based on the automated word count of the computer word-processing program; that the facts stated therein are true and on those grounds allege that such matters are true, except to matters stated on information and belief, and as to those matters I believe them to be true; and that I make such verification because Petitioner is absent from the County where my office is located and is unable to verify the petition, and because as counsel for Petitioner I am more familiar with such facts than is Petitioner.

Sworn under penalty of perjury under the laws of the State of California this 10<sup>th</sup> day of March 2025 at Vallejo, California.

Respectfully submitted,

/s/ Elizabeth Hudson

Elizabeth Hudson, Esq. / Shoemaker Law Offices,  
[beth@shoemakerlawoffices.com](mailto:beth@shoemakerlawoffices.com)  
Counsel for *Petitioner*

**IX. CERTIFICATE OF SERVICE**

I certify that on March 10, 2025, I electronically filed the foregoing  
**ANSWER BRIEF ON THE MERITS**  
with the Clerk of the Supreme Court of the State of California by using the appellate  
TrueFiling system. The following case participants were served:

<b>Counsel for Respondent WCAB:</b> Anne Schmitz, Esq. Eric D. Ledger, Esq. Andrew A. Wood, Esq. Workers' Compensation Appeals Board 455 Golden Gate Avenue, 9 <sup>th</sup> Floor San Francisco, CA 94102	<b>Counsel for Respondent Ross Valley:</b> Christian Kerry, Esq. Hanna Brophy MacLean McAleer & Jensen, LLP P.O. Box 12488 Oakland, CA 94604-2488
--	--

I certify that, unless otherwise noted, all participants in the case are registered  
TrueFiling users and that service will be accomplished by the appellate TrueFiling system.  
I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct, and that this declaration was executed at Vallejo, California.

Respectfully submitted,

March 10, 2025

/s/ Elizabeth Hudson  
Elizabeth Hudson / Shoemaker Law Offices  
[beth@shoemakerlawoffices.com](mailto:beth@shoemakerlawoffices.com)  
Counsel for Petitioner

**CERTIFICATE OF SERVICE**

I certify that on March 11, 2025, I electronically filed the foregoing

**NOTICE OF ERRATA**

with the Clerk of the Supreme Court of the State of California by using the appellate

TrueFiling system. The following case participants were served:

<p><b>Counsel for Respondent WCAB:</b> Anne Schmitz, Esq. Eric D. Ledger, Esq. Andrew A. Wood, Esq. Workers' Compensation Appeals Board 455 Golden Gate Avenue, 9<sup>th</sup> Floor San Francisco, CA 94102</p>	<p><b>Counsel for Respondent Ross Valley:</b> Christian Kerry, Esq. Hanna Brophy MacLean McAleer &amp; Jensen, LLP P.O. Box 12488 Oakland, CA 94604-2488</p>
--	--

I certify that, unless otherwise noted, all participants in the case are registered TrueFiling users and that service will be accomplished by the appellate TrueFiling system.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed at Vallejo, California.

Respectfully submitted,

March 11, 2025

/s/ Elizabeth Hudson  
Elizabeth Hudson / Shoemaker Law Offices  
[beth@shoemakerlawoffices.com](mailto:beth@shoemakerlawoffices.com)  
Counsel for Petitioner

**STATE OF CALIFORNIA**  
Supreme Court of California

**PROOF OF SERVICE**

**STATE OF CALIFORNIA**  
Supreme Court of California

Case Name: **MAYOR v. W.C.A.B. (ROSS VALLEY SANITATION DISTRICT)**

Case Number: **S287261**

Lower Court Case Number: **A169465**

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My email address used to e-serve: **beth@shoemakerlawoffices.com**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

<b>Filing Type</b>	<b>Document Title</b>
NOTICE OF ERRATA	03.11.25 NOTICE OF ERRATA joseph mayor

Service Recipients:

<b>Person Served</b>	<b>Email Address</b>	<b>Type</b>	<b>Date / Time</b>
Allison Fairchild Workers' Compensation Appeals Board of the State of California 170095	afairchild@dir.ca.gov	e-Serve	3/11/2025 11:30:08 AM
Anne Schmitz Workers Compensation Appeals Board 166664	ASchmitz@dir.ca.gov	e-Serve	3/11/2025 11:30:08 AM
Elizabeth Hudson Shoemaker Law Offices 161391	beth@shoemakerlawoffices.com	e-Serve	3/11/2025 11:30:08 AM
Christian Kerry Hanna Brophy MacLean McAleer & Jensen LLP 213477	ckerry@hannabrophy.com	e-Serve	3/11/2025 11:30:08 AM

This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

3/11/2025

Date

/s/Elizabeth Hudson

Signature

Hudson, Elizabeth (161391)

Last Name, First Name (PNum)

Shoemaker Law Offices

