Here is a list of Potential Questions to ask when someone claims industrially related COVID-19. It is imperative to get as much information about their life, activities, contacts, etc ASAP as we only have 30 days to initially deny the case. These are not all the questions that can be asked, just a suggestion of questions that should be asked. Information should be obtained from co-workers as well, if possible, regarding the alleged injured worker's exposure. I would recommend that although we believe the incubation period is up to 14 days, we should inquire about 30 days prior to the onset of symptoms.

- 1) When did you first start noticing symptoms? What symptoms did you first notice? What other symptoms did you later have, if any? Did you seek treatment? Where and when? What symptoms do you currently have? Did you have a fever? If so, when did it start? How long did it last? How high was the fever? Have you tested positive for COVID-19? When and by whom? Have you received a diagnosis of COVID-19? When and by whom? Ask for the test results!
- 2) What are your current symptoms? If resolved, when did they resolve? Have you received a negative COVID-19 test after resolution of your symptoms?
- 3) Were you working at your Employer's premises? Who instructed you to come to work? What was the last day you worked at the employer's premises prior to experiencing symptoms?
- 4) While at work were there others there? Who and how many? How close in proximity did you work with them?
- 5) How do you commute to work? Do you carpool? Who else is in the car with you? If you used public transportation, how many others were you in contact with?
- 6) Have you returned to work? When? Have you been working from home? Since when?
- 7) Who lives in your home? Does anyone else in your home have symptoms? What symptoms do they have? When did they first start noticing their symptoms? What measures have been taken to protect yourself and others in your home?
- 8) Does anyone in your home go to work? If so, where do they work? At their work are there others they work with? How close do they work together? Do they wear masks and/or gloves? Is their workplace sanitized?
- 9) Do you or someone in your home regularly clean commonly touched surfaces? If so, how and how often?
- 10) What is your current residence? How long have you lived there? In the 30 days before you began noticing symptoms, did you live, stay or sleep anywhere else? Have you lived, stayed or sleept anywhere other than your residence for the past 30 days? Do you use an elevator or common area to get to your home? If yes, were you in contact with others within 14 days prior to the onset of symptoms?
- 11) Do you have any friends, relatives, acquaintances, etc. that have symptoms or have been diagnosed and/or tested positive for COVID-19? Do you know if you have been in contact with anyone that has been diagnosed and/or tested positive for COVID-19. This could include neighbors, police officers, grocery store workers, etc.
- 12) Who has been staying, living, sleeping, visiting your house within the previous 30 days before you noticed symptoms? This should include ALL people...delivery people, neighbors, pet groomers, friends, etc. Do you have children living in your home? If so, have they had any friends visiting within 30 days prior to your symptoms? Have your children visited friends outside the home within 30 days prior to your symptoms?

- 13) Have you been told you were a subject in contact tracing for a potential patient exposed to COVID-19? If so, whom? Who contacted you? When were you notified? Were you instructed to self quarantine? If so, did you?
- 14) Have you been to any public gatherings within 30 days prior to your symptoms or any gathering where there were people other than people you live with? This should be a gathering of any number of people. Have you been to any gatherings where there were more than 10 people within 30 days prior to your symptoms? Where and when was this gathering?
- 15) Have you used any form of public transportation within 30 days prior to your symptoms, including train, bus, UBER, LYFT, medical transportation, plane or any other ride share?
- 16) Have you been outside the city, state or country within 30 days prior to your symptoms? If so, where and when? Have you been in contact with anyone who has travelled outside the city, state or country within 30 days prior to your symptoms? If so, where and when? Have you been to an airport within 30 days prior to your symptoms?
- 17) Have you been to a doctor's office or hospital within 30 days prior to your symptoms? If so, where? Have you been to a doctor's office or medical facility within in the past 30 days? Where? Who is your primary physician? For how long? Try to get a 10 year medical history.
- 18) Have you been driving? Has anyone been driving in the car with you? Have you driven in anyone else's car? Whom? Do you all wear masks and/or gloves? Have any people you have driven with tested positive, been diagosed or have symptoms?
- 19) What co morbities/non industrial conditions do you have? HBP, diabetes, obesity, respiratory issues, asthma, cancer, depression, psyche, heart condition, kidney disease....anything?
- 20) Where had you been and what had you been doing for the 14 days prior to your onset of symptoms? This should be as detailed as possible....went out for dinner, went to a gas station, used a public restroom, went to the beach or pool, stayed at a hotel, motel, B&B, Air BnB, etc. went to the movies, went to a Theme/Amusement park, House of Worship, went to a bar, went to a mall, restaurant, went shopping...etc. Find out when and where?
- 21) Do you go on walks? Where? With whom? Do you wear a mask and/or gloves? When you wear a mask, do you cover your nose and mouth? Do you come across other people while on the walk? Had you been on a walk within 30 days prior to your symptoms? When/Where?
- 22) Have you had any groceries or packages delivered within 30 days prior to your symptoms? When you receive these packages, do you sanitize them? How do you sanitize them? What precautions do you take to sanitize things delivered to your house?
- 23) Have you been grocery shopping or any other kind of shopping within 30 days prior to your symptoms? Where? Do you wear a mask and/or gloves? When you wear a mask do you cover your nose and mouth?
- 24) Do you have any Social Media Accounts, Facebook, Tik Tok, Twitter, Instagram, Snapchat, etc.? What is your name on these sites?

AGAIN, THESE ARE SUGGESTIONS. WHEN YOU GET THE ANSWERS, FOLLOW THE LINE OF QUESTIONING, DON'T MOVE ON TO THE NEXT QUESTION, IF THE ANSWER GIVES YOU OTHER INFORMATION....FOLLOW THAT.

IF YOU HAVE ANY QUESTIONS, PLEASE DO NOT HESITATE TO CONTACT ME: Lori@wenderofflaw.com (818)407-1413, cell: (310) 880-1154