



Top 10 “Plays” to Reduce your Workers’ Compensation Costs

January 8, 2019



COOLIDGE WALL
A Legal Professional Association

Michelle D. Bach, Esq.
bach@coollaw.com
937.223.8177

Michelle D. Bach, Esq.





MIAMI
UNIVERSITY
OXFORD OHIO

PLAYS
AND POEMS
OF
SHAKESPEARE
— 3 —

TR. OF VENICE.
— SUM. NIGHT'S
DREAM.
— LOVE'S LABOR'S
LOST

PLAYS
AND POEMS
OF
SHAKESPEARE
— 4 —

TWELFTH NIGHT.
— MUCH ADO.
— AS YOU LIKE IT

PLAYS
AND POEMS
OF
SHAKESPEARE
— 5 —

ALL'S WELL.
— TAMING
OF THE SHREW.
— WINTER'S TALE

PLAYS
AND POEMS
OF
SHAKESPEARE
— 6 —

MACBETH.
— K. JOHN.
— K. RICHARD II

PLAYS
AND POEMS
OF
SHAKESPEARE
— 7 —

K. HENRY IV. I
K. HENRY IV. II
K. HENRY V



PITT LAW
UNIVERSITY OF PITTSBURGH





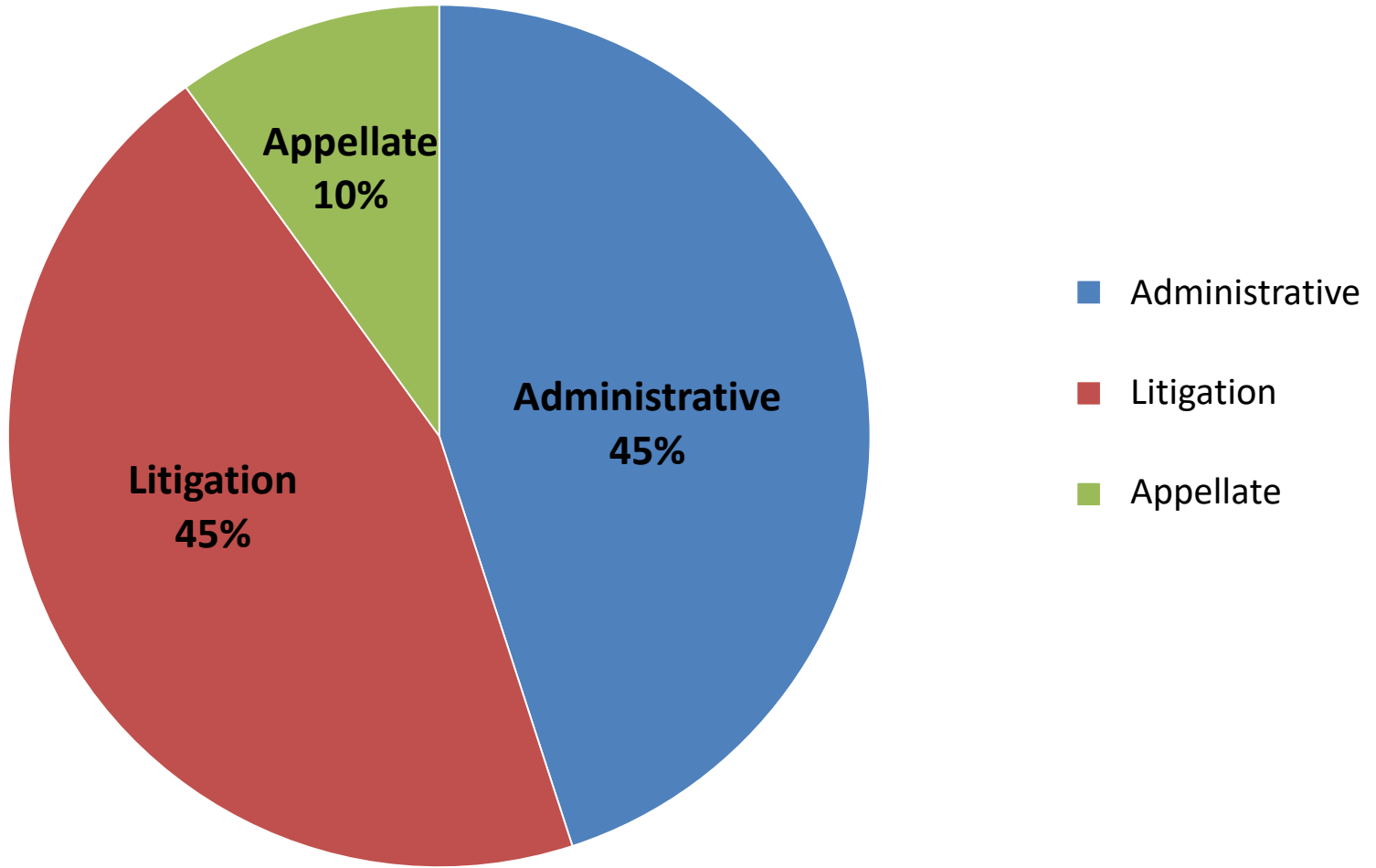
A photograph of a building's exterior featuring a large, light-colored granite wall. The words "COOLIDGE WALL" are mounted on this wall in large, white, three-dimensional serif letters. Above the wall, there are large glass windows reflecting the sky and surrounding trees. Green tree branches are visible in the upper right corner. In the background, other buildings are visible, including one with a white steeple.

COOLIDGE WALL



My passion is...

Breakdown of our Workers' Compensation Practice





Top 10 "Plays" **to Reduce Your Workers'** **Compensation Costs**





deny certification

incident report form

witness statements

employee handbook

surveillance

2

Pick the best coach

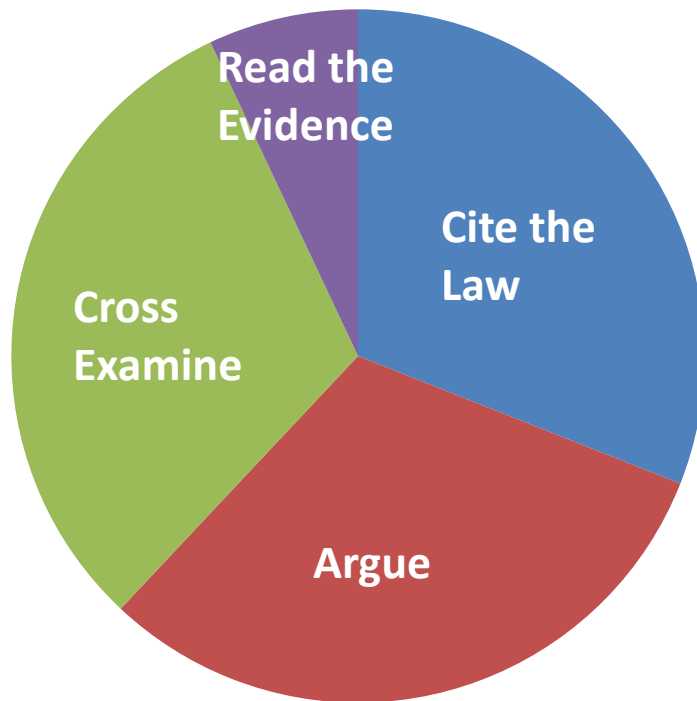


IC Resolution R04-1-01

LAWYER

vs.

TPA



TPAs cannot:

- ask questions
- cite the law
- argue

3

Play good defense



Industrial Commission Hearing Room





Medical Defense

➤ Releases and
Medical Records

➤ Defense IME



REQUEST FOR RELEASE OF MEDICAL RECORDS

Date: _____

To: _____
Physician's Name

Address

City State Zip

I hereby request that my medical records be released to:

Physician's Name (print)

Address

City State Zip

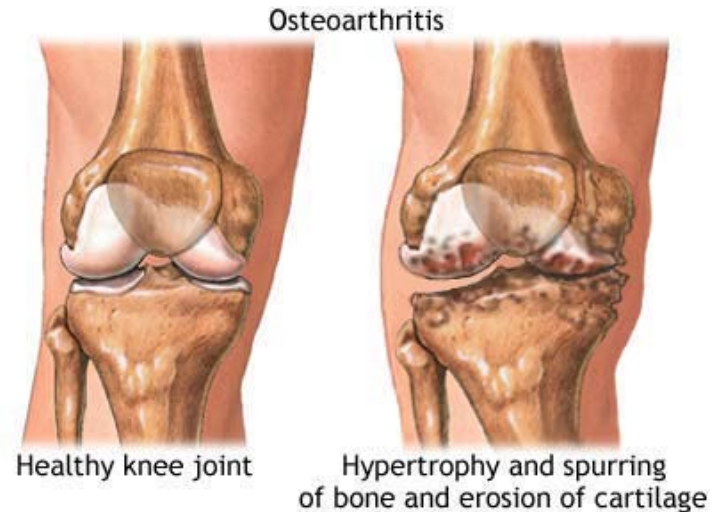
Legal Defenses

- Arise out of and in the course of employment
 - coming and going rule
 - horseplay
 - intoxication
 - idiopathic



Legal Defenses (cont'd)

- Pre-existing conditions
- Natural deterioration
- Substantial aggravation
- Psychological conditions
- Occupational disease standard
- Statute of limitations
- Continuing jurisdiction



Hearing Room Strategies

➤ Court Reporter



GENERAL AFFIDAVIT

STATE OF _____
COUNTY OF _____

PERSONALLY came and appeared before me, the undersigned Notary, the within named _____, who is a resident of _____, County, State of _____, and makes this his/her statement and

➤ Submit Statements

DATED this the ____ day of _____, 20____

Signature of Affiant

SWORN to subscribed before me, this ____ day ____ 20____

➤ Call Witnesses



5/8/17



➤ Request More Time

➤ Rely on the Evidence



4

Appeal to Court



Court of Common Pleas Courtroom

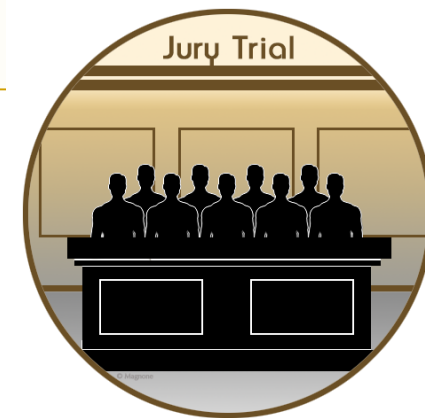


R.C. 4123.512: Can appeal Industrial Commission
orders other than “extent of disability” to
Court of Common Pleas

Allowance



Court of Common Pleas
(jury trial)



Jury Trial Procedure:

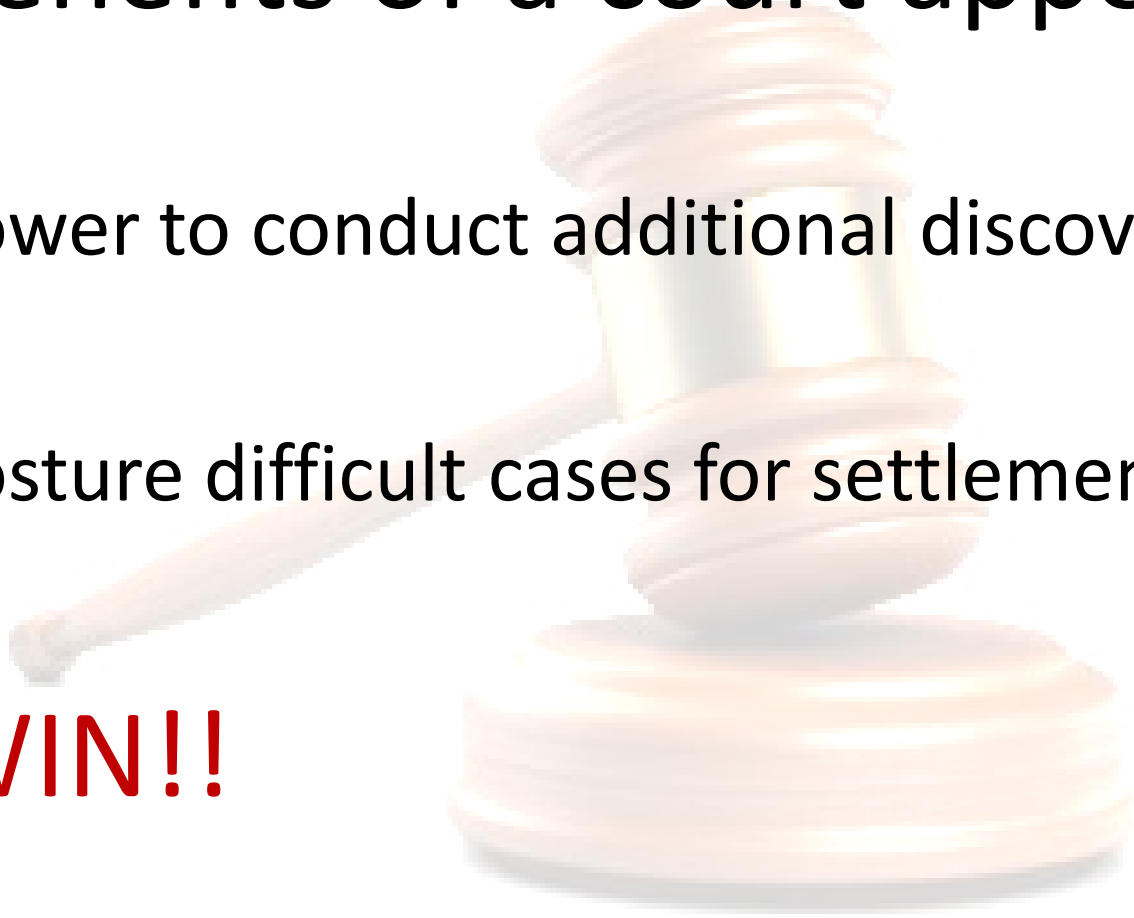
Notice of Appeal
Complaint
Answer
Discovery
Jury Trial



Verdict

Benefits of a court appeal

- Power to conduct additional discovery
- Posture difficult cases for settlement
- **WIN!!**



Don't give up!

5

Damage Control



A person is shown from the waist down, wearing a grey athletic skirt and blue and white sneakers. They are using a white metal walker and have a white and blue leg brace on their right leg. The background is a bright, out-of-focus indoor space.

Salary continuation

Transitional work programs

Rehabilitation

MMI exams

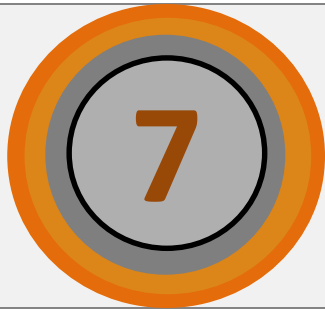
Contest treatment

6

Handicap reimbursement

Course Handicap		Hole Handicap				
Pebble Beach		Hole 2	Hole 3	Hole 4	Hole 5	Hole 6
		9* Par 4	13* Par 4	1* Par 5	15* Par 3	5* Par 3
Team 1	70.0/58.0	3	3	3	4	
Phillip HCP - 13		5*	6*	5*	4	
Jeff Shanahan HCP - 9		4*	3	4*	5	
Team 2	82.0/70.0	4	4	4	4	
		Par 3	Par+1 4	Par+2 5	Par+3 6	Par+4 7
		Par+5 8	Par+6 9	Par+7 10	Par+8 11	Par+9 12

Handicap Indicator



BWC Discount and Rating Programs

EVERY SEASON STARTS AT
DICK'S
SPORTING GOODS

TAKE **20% OFF** THROUGHOUT THE STORE

Limit one coupon per customer. Cannot be combined with any other offers, coupons, team discount or Guaranteed In-Stock markdown, or used for gift cards, licenses or previously purchased merchandise. **Coupon valid on in-store purchases only.** No reproductions or rain checks accepted. Returns or exchanges where a ScoreCard Reward or other discount was applied may result in an adjusted refund amount. Excludes guns/ammo/select launch, new release merch, PING, Uggs, Babolat. Some additional exclusions may apply. See store for details.



P0001414500012121

EVERY SEASON STARTS AT
DICK'S
SPORTING GOODS

COMMUNITY PROGRAM

DicksSportingGoods.com

8

Group rating programs



9

Settlement

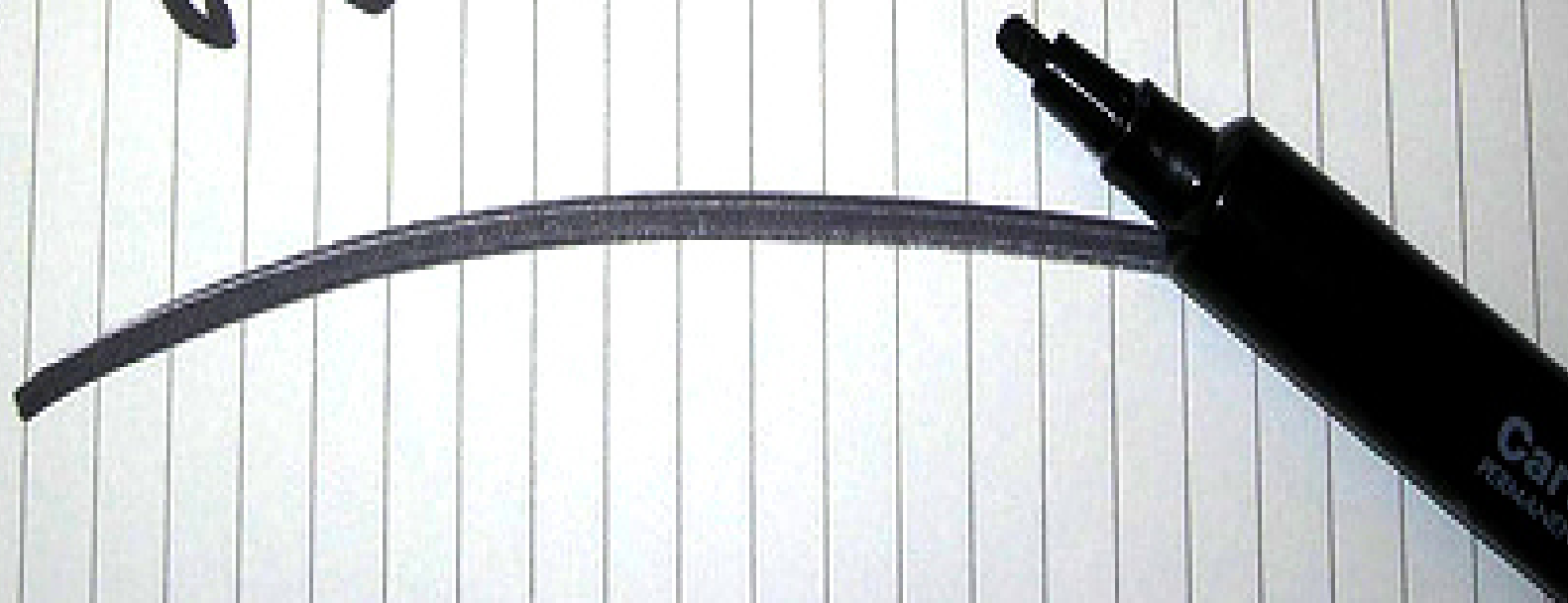


10

Get a gimme



Questions?



Contact Me

Michelle D. Bach, Esq.
Coolidge Wall Co., L.P.A.
33 W. First Street, Suite 200
Dayton, OH 45402
937.223.8177
www.coollaw.com