

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY
ASBESTOS LITIGATION

<p>JAMES & LILLIAN COLLAS,</p> <p style="text-align: right;"><i>Plaintiff(s),</i></p> <p style="text-align: center;">vs.</p> <p>3M COMPANY, et al</p> <p style="text-align: right;"><i>Defendant(s).</i></p>

Docket No: **L-7275-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER IV

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on August 27, 2014:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	William L. Kuzmin	Plaintiff(s)
Breuninger & Fellman	Kathleen Ramalho	National Automotive Parts Assoc.
Caruso Smith	Lisa Massimi	CertainTeed; Union Carbide
Eckert Seamans	Brian Wolensky	Navistar
Goldfein & Joseph	Madhurika Jeremiah	ACL
Hoagland Longo	Daniel Kuzmerski	Borg Warner
Landman Corsi	Elissa Denniston Regev	Ford Motor
Marks O'Neill	Dennis Schmieder	Caterpillar, Inc.
Marshall Dennehey	Lisa Only	Pep Boys
McElroy Deutsch	Nancy McDonald	Lipe
Rawle & Henderson	David J. Samlin	Mack Trucks; Hennessy

IT IS on this 28th day of August, 2014 effective from the conference date;

ORDERED as follows:

Counsel receiving this Order through computerized electronic medium (E-Mail) shall be deemed by the court to have received a copy of the filed original court document. Any document served pursuant to this Order shall be deemed to be served by mail pursuant to R.1:5-2.

DISCOVERY

December 31, 2014 Fact discovery, including depositions, shall be completed by this date. Plaintiff's counsel shall contact the Special Master within one week of this deadline if all fact discovery is not completed.

December 31, 2014 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

- October 31, 2014 The settlement conference previously scheduled on this date is **CANCELLED**.
- December 15, 2014 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- February 6, 2015 Summary judgment motions shall be filed no later than this date.
- March 6, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

- January 30, 2015 Plaintiff shall serve a wrongful death report by this date.
- April 6, 2015 Defendants shall serve medical expert reports, if any, in response to the wrongful death report, by this date.

LIABILITY EXPERT REPORTS

- January 16, 2015 Plaintiff shall identify its liability experts and serve liability expert reports or a certified expert statement by this date or waive any opportunity to rely on liability expert testimony.
- April 6, 2015 Defendants shall identify its liability experts and serve liability expert reports, if any, by this date or waive any opportunity to rely on liability expert testimony.

EXPERT DEPOSITIONS

- April 30, 2015 Expert depositions shall be completed by this date. To the extent that plaintiff and defendant generic experts have been deposed before, the parties seeking that deposition in this case must file an application before the Special Master and demonstrate the necessity for that deposition. To the extent possible, documents requested in a deposition notice directed to an expert shall be produced three days in advance of the expert deposition. The expert shall not be required to produce documents that are readily accessible in the public domain.

PRE-TRIAL AND TRIAL

- January 16, 2015 @ 10:00am Settlement conference. All defense counsel shall appear with authority to negotiate settlement and have a representative authorized to negotiate settlement available by phone. Any request to be excused from the settlement conference shall be made to the Special Master no later than 4:00pm of the day prior to the conference.
- April 2, 2015 @ 10:00am Settlement conference. All defense counsel shall appear with authority to negotiate settlement and have a representative authorized to negotiate

settlement available by phone. Any request to be excused from the settlement conference shall be made to the Special Master no later than 4:00pm of the day prior to the conference.

May 11, 2015

Trial Date. (*The December 8, 2014 trial is adjourned to this date.*)

Plaintiff's counsel shall serve a copy of this Order upon any additional counsel immediately upon receipt.

/s/ Ana C. Viscomi
ANA C. VISCOMI, J.S.C.

cc: Clerk, Mass Tort
Brody Deposition Services
Priority One