

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

<p>DOROTHY & JOHN J. REDMOND,</p> <p style="text-align: center;"><i>Plaintiff(s),</i></p> <p style="text-align: center;">vs.</p> <p>3M COMPANY, et al</p> <p style="text-align: center;"><i>Defendant(s).</i></p>

Docket No: **L-616-14 (AS)**

Civil Action

CASE MANAGEMENT ORDER I

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on May 22, 2014:

FIRM	ATTORNEY	CLIENT
Seeger Weiss	Dennis Geier	Plaintiff(s)
Baginski Mezzanotte	Jennifer Connelly	HM Royal
Caruso Smith Picini	Richard Picini	Union Carbide; CertainTeed
Gibbons PC	Robert D. Brown Jr.	Honeywell International
Hoagland Longo	Ketherine Blok	Burnham; Goulds Pumps
K&L Gates	Michele Mittleman	Crane
Kelley Jasons	Joseph Vassalotti	Nibco; Ricwil
Lavin O'Neil	Nicholas Stathes	3M Company
Lynch Daskal	Alexandra Ober	Georgia Pacific
Margolis Edelstein	Joni Tarchichi	Columbia Boiler Co.
Marks O'Neill	Matthew A. Wachenstein	GPU Energy
Maron Marvel	Carolyn Williams	Industrial Holdings Corp.
Marshall Dennehey	Monica Fillmore	Kaiser Gypsum; Riley Power
Mayfield Turner	Andrew Keith	Carrier Corp.
McCarter & English	Jean Patterson	Fisher Controls
McElroy Deutsch	Michelle Hydrusko	AO Smith Water Products; Flowserve
McGivney Kluger	Thomas McNulty	Weil McLain; Zurn; Taco
O'Toole Fernandez	Leslie Lombardy	Dana; Peerless Industries
Pepper Hamilton	Melissa Chaderewicz	Bristol Myers Squibb
Reilly Janiczek	Thomas Grady	ITT; Aurora; Cleaver Brooks
Segal McCambridge	Michael F. Gorman	BW/IP
Speziali Greenwald	Joanne Hawkins	General Electric; Foster Wheeler; CBS
Wilbraham Lawler	Mary Chicorelli	PSE&G

IT IS on this 9th day of June, 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.

Defense counsel shall notify plaintiffs' counsel within thirty (30) days of the date of this Order if their client was incorrectly named in the Complaint. Counsel may be barred from raising this defense at a later time for failure to comply.

DISCOVERY

- June 6, 2014 Plaintiff shall serve answers to standard interrogatories, provide the information required by paragraph VI.B.1.a. of the General Order, and shall advise defendants whether the plaintiff is available for deposition and, if not, the reasons therefore by this date.
- June 13, 2014 Defendants shall serve answers to standard interrogatories by this date.
- June 27, 2014 Plaintiff shall propound supplemental interrogatories and document requests by this date.
- July 31, 2014 Defendants shall serve answers to supplemental interrogatories and document requests by this date.
- June 27, 2014 Defendants shall propound supplemental interrogatories and document requests by this date.
- July 31, 2014 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- August 29, 2014 Plaintiff depositions shall be concluded by this date. Plaintiff's counsel shall contact the Special Master within one week of this deadline if plaintiff depositions are not completed by this date.
- September 30, 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.
- September 30, 2014 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

- October 3, 2014 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- October 24, 2014 Summary judgment motions shall be filed no later than this date.
- November 21, 2014 Last return date for summary judgment motions.

MEDICAL DEFENSE

- June 6, 2014 Plaintiff shall serve executed medical authorizations by this date.
- July 18, 2014 Plaintiff shall serve medical expert reports by this date.

July 18, 2014 Plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

November 28, 2014 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

LIABILITY EXPERT REPORTS

October 17, 2014 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.

November 28, 2014 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

December 19, 2014 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

December 16, 2014 @ 1:30pm 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.

January 12, 2015 Trial 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