

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

Docket No: **L-3809-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER X

GAIL ANDRU (Estate of Andrew & Dorothy Nelson), <i>Plaintiff(s),</i>
vs.
3M COMPANY, et al <i>Defendant(s).</i>

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on May 4, 2017:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s)
Breuninger Fellman	Kathleen Ramalho	NAPA
Budd Larner	Terence W. Camp	Ericsson, Inc.
Caruso Smith	Alexandra Caruso	Union Carbide; CertainTeed
Darger Errante	Mark Friesz	Lightolier
Day Pitney	Naju R. Lathia	Phelps Dodge Ind.
Forman Watkins	Matthew G. Broderson	Cooper Industries
Gibbons PC	Alan Gries	Selby Battersby; Honeywell
Harris Beach	David Kochman	Progress Lighting; Hubbell Inc.; Hubbell Power Systems
Hoagland Longo	Alyssa DeFuria	Exteco; WW Grainger
Kelley Jasons	Robert Connor	Square D; Victaulic; Northern Pump; McNally
Leader & Berkon	Christine Bucca	Spirax Sarco
Lynch Daskal	Troy B. Cunningham	Georgia Pacific
Margolis Edelstein	Jeanine D. Clark	Belden; Alpha Wire; John Crane
Marks O'Neill	Sophia Tyris	Whirlpool Corp.; Columbia Boiler
Marshall Dennehey	Arthur Bromberg Paul Johnson	Warren Pumps; RSCC Wire & Cable; AIW; Leviton
Mayfield Turner	Joshua Locke	Carrier Corp.
McCarter & English	John C. Garde	Hercules; Ashland, Inc.
McCullough Ginsberg	Jason Schmolze	Okonite
McElroy Deutsch	Joseph D. Rasnek	Allen-Bradley; Burnham; Eaton; Tyco
Pascarella DiVita	Bradley E. Bishop	Trane; General Cable; Crane; Deming Pumps (a division of Crane Pump System)
Porzio Bromberg	Ahmed J. Kassim	DuPont
Reilly Janiczek	Zachery Green	Aurora; Cleaver Brooks; CR Daniels; Goulds Electronics; Samson Electric Supply
Salmon Ricchezza	John Dugan	AGCO Corp.
Vasios Kelly	Brooke Anderson	Bird, Inc.
Wilbraham Lawler	Tristin Fabro	Buffalo Pumps; Siemens

IT IS on this 17th day of May, 2017 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

August 31, 2017 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.

August 31, 2017 Depositions of corporate representatives shall be completed by this date.

SUMMARY JUDGMENT MOTION PRACTICE

September 15, 2017 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

September 29, 2017 Summary judgment motions shall be filed no later than this date.

October 27, 2017 Last return date for summary judgment motions.

MEDICAL DEFENSE

January 31, 2018 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

LIABILITY EXPERT REPORTS

November 30, 2017 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.

January 31, 2018 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.

ECONOMIST EXPERT REPORTS

November 30, 2017 Plaintiff shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

January 31, 2018 Defendants shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

EXPERT DEPOSITIONS

February 28, 2018 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

August 24, 2017 The settlement conference previously scheduled on this date is **cancelled**.

February 27, 2018 @ 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.

March 26, 2018 Trial Date. (*The September 25, 2017 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