

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

Docket No: **L-3751-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER IX

NORMA DWYER (Estate of JOHN DWYER),  vs.  3M COMPANY, INC., et al	<i>Plaintiff(s),</i>    <i>Defendant(s).</i>
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This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on *January 15, 2016*:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	William L. Kuzmin	Plaintiff(s)
Bucca & Campisano	Benjamin Bucca, Jr.	IMO
Condon & Forsyth	Marissa Lefland	Resco Holdings
Connell Foley	Scott Press	Public Service
Darcambal Ousley	Nada Peters	Kraft/Mondelez
Drinker Biddle	Jack Frost	American Optical
Hoagland Longo	Steven Satz	Goulds Pumps
Kent McBride	Robert Florke	Alfa Laval
Landman Corsi	Jorkeell Echeverria	Anheuser Busch; Sequoia Ventures Inc.
Lavin O'Neil	Jake Yzzi	Verizon New Jersey
Littleton Joyce	Jason Schmitz	BASF Catalysts
Marin Goodman	Alexander Drago	Fluor
Marks O'Neil	Paul Smyth	JCP&L
McElroy Deutsch	Joseph D. Rasnek	Exxon Mobil; Chevron
McGivney Kluger	Joel Clark	JW Wallace
Porzio Bromberg	Pamela Kaplan	DuPont
Reilly Janiczek	Adrianna Exler	Cleaver Brooks
Spezialli Greenwald	Joanne Hawkins	General Electric; CBS; Foster Wheeler
Weiner Lesniak	Edward Seaver	Merck
Wilson Elser		Shell Oil Co.

IT IS on this 19<sup>th</sup> day of **January, 2016** 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**

March 11, 2016            Depositions of corporate representatives shall be completed by this date.

## **EARLY SETTLEMENT**

March 18, 2016            Settlement demands shall be served on all counsel and the Special Master by this date.

## **SUMMARY JUDGMENT MOTION PRACTICE**

April 1, 2016            Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

April 15, 2016            Summary judgment motions shall be filed no later than this date.

May 13, 2016            Last return date for summary judgment motions.

## **MEDICAL DEFENSE**

June 3, 2016            Defendants shall identify its medical experts and serve medical reports, if any, by this date. **In addition, defendants shall notify plaintiff's counsel (as well as all counsel of record) of a joinder in an expert medical defense by this date.**

## **LIABILITY EXPERT REPORTS**

April 1, 2016            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.

June 3, 2016            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.

June 30, 2016            Plaintiff shall identify its rebuttal liability experts and serve rebuttal liability expert reports, if any, by this date.

## **ECONOMIST EXPERT REPORTS**

April 1, 2016            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.

June 3, 2016            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**

June 24, 2016            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

