

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

Docket No: **L-2882-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER IV

CHRISTOPHER MORELLI (Estate of Michelle Morelli),  <i>Plaintiff(s),</i>  vs.  HONEYWELL INTERNATIONAL INC., et al  <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 *October 2, 2014*:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	William Kuzmin	Plaintiff(s)
Shrader & Associates	Allyson Romani	Plaintiff(s) co-counsel
Gibbons PC	Philip Crawford	The Sherwin-Williams Co.
O'Toole Fernandez	Joshua Lichtenstein	RT Vanderbilt

IT IS on this 3<sup>rd</sup> day of **October, 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**

November 14, 2014 RT Vanderbilt shall serve answers to supplemental interrogatories and document requests by this date.

January 16, 2015 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.

January 16, 2015 Depositions of corporate representatives shall be completed by this date.

**SUMMARY JUDGMENT MOTION PRACTICE**

March 27, 2015 Summary judgment motions shall be filed no later than this date.

April 24, 2015 Last return date for summary judgment motions.

**MEDICAL DEFENSE**

December 31, 2014 Defendants shall identify its medical experts and serve medical expert 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**

February 27, 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.

May 22, 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.

**ECONOMIST EXPERT REPORTS**

May 22, 2015 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 12, 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**

June 29, 2015 Trial Date. *(The January 26, 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