

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

<p>DOROTHY &amp; JOHN J. REDMOND, <i>Plaintiff(s),</i></p> <p>vs.</p> <p>3M COMPANY, et al <i>Defendant(s).</i></p>
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Docket No: **L-616-14 (AS)**

Civil Action

CASE MANAGEMENT ORDER V

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on February 9, 2016:

FIRM	ATTORNEY	CLIENT
Simmons Hanly Conroy	Laurence Nassif	Plaintiff(s)
Baginski Mezzanotte	Mark Macdonald	HM Royal; Viking Pump
Bucca & Campisano	Christine Bucca	IMO
Budd Lerner	Terence Camp	Goodyear Tire & Rubber
Connell Foley	Richard Jagen	August Arace; Frank McBride
Drinker Biddle	Jack N. Frost, Sr.	Neles-Jamesbury
Eckert Seamans	Stephanie Coleman	AO Smith Water Products
Hack Piro	Reiah Etwaroo	HB Smith; Johansen
Hardin Kundla	Nicea D'Annunzio	Calon Insulation; Strahman Valves
Hoagland Longo	Jason R. Gosnell	Goulds Pumps; Johnston Controls; EMCO Fittings
Kelley Jasons	Robert T. Connor	Nibco; Ricwil
Kent McBride	David Rutkowski	Binsky; Marsam
Lavin O'Neil	Donna Candelora	3M Company
Leader & Berkon	Joseph Fontak	Copes-Vulcan; Spirax Sarco
Margolis Edelstein	Jeanine D. Clark	Central Jersey; United Engineers; Ideal Supply; Columbia Boiler; Woosulate
Marks O'Neill	Paul Smyth	GPU Energy; Honeywell; Nicholas Schwalje
Marks O'Neill	Sebastian Goldstein	Barnes & Jones; Columbia Boiler
Maron Marvel	Carolyn Williams	Industrial Holdings Corp.
Marshall Dennehey	Paul Johnson	Kaiser Gypsum; Riley Power
Mayfield Turner	Jacob Crockett	Carrier Corp.
McCarter & English	Elizabeth Monahan	Fisher Controls
McElroy Deutsch	Andrew F. Bain	Burnham; Flowserve US Inc.; Pfizer
McGivney Kluger	Caitlin Christie Marc Wisel	Taco; Weil McLain; Zurn; Raritan; A Dover
Morgan Lewis	Christopher Iannicelli	ITT Corp.
O'Toole Fernandez	Gina M. Apostolico	Peerless; Dana
Pascarella DiVita	Charles P. Savoth, III	Trane US Inc.; Crane Co.
Pepper Hamilton	Jeff Carr	Allied Chemical; Honeywell Int'l as successor to Wilpette Cake Oven; Bristol Myers Squibb
Reilly Janiczek	Edward Henry	Aurora; Cleaver Brooks

Sedgwick LLP	Nicole Nielson-Pachkofsky	Flowserve d/b/a Wilson-Snyder Pumps; Foster Wheeler; CBS/Westinghouse; General Electric
Segal McCambridge	Audrey O. Anyaele	BW/IP
Vasios Kelly	Thomas J. Kelly, Jr.	Armstrong Int'l, Inc.
Wilbraham Lawler	Tristin Fabro	PSE&G; Air Con; Air & Liquid Systems; Exelon

IT IS on this 11<sup>th</sup> day of February, 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**

September 30, 2016 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.

October 31, 2016 Depositions of corporate representatives shall be completed by this date.

### **EARLY SETTLEMENT**

October 14, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

### **SUMMARY JUDGMENT MOTION PRACTICE**

November 4, 2016 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

November 18, 2016 Summary judgment motions shall be filed no later than this date.

December 16, 2016 Last return date for summary judgment motions.

### **MEDICAL DEFENSE**

October 31, 2016 Plaintiff shall serve medical expert reports, if any, by this date and transfer pathology to Reilly Janiczek.

January 31, 2017 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**

November 30, 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.

January 31, 2017 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**

February 24, 2017 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 11, 2016 The settlement conference previously scheduled on this date is **cancelled**.

February 9, 2017 @ 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.

March 13, 2017 Trial Date. (*The September 12, 2016 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