

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

Docket No: **L-1933-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER IV

<p>RACHELE & DAVID VENTRES,</p> <p style="text-align: center;"><i>Plaintiff(s),</i></p> <p style="text-align: center;">vs.</p> <p>002 AUTO PARTS, INC., et al</p> <p style="text-align: center;"><i>Defendant(s).</i></p>

This matter coming in for a Case Management Conference with Special Master, Agatha N. Dzikiewicz, on May 15, 2013 and the following firms appearing:

FIRM	ATTORNEY	CLIENT
Levy Phillips & Konigsberg	John Guinan	Plaintiff(s)
Bodell Bove		BWP Distributors
Brueninger & Fellman	Kathleen Ramalho	NAPA
Caruso Smith	Marcia DePolo	Union Carbide
Eckert Seamans	Michelle D. Grady	Vermont Talc
Gibbons	Robert D. Brown, Jr.	Honeywell
Goldberg Segalla	Bonnie Hanlon	R. Bosch
Hardin Kundla	Cynthia Lee	Harley Davidson
Hoagland Longo	Kristy K. Lyons	Borg Warner
Lavin O'Neil	Catherine Brunermer	3 M Company
LeClair Ryan	Robyn Kalocsy	Ford
Littleton Joyce	Christine M. Delaney	BASF
Maron Marvel	Meryl Topchik	IHC
Marshall Dennehey	Christopher B. Block	NMBFIL, Inc.
McGivney Kluger	Caitlin Christie	Permatex; Vermont Talc
McGowan Law Office	John S. McGowan	Sears
O'Toole Fernandez	Leslie Lombardy	Dana Co.
Porzio Bromberg	Michelle Burke	DuPont
Smith Abbot	Roy Viola	Abex
Wilbraham Lawler	Andrea Greco	Maremont
Wilson Elser	Bruce McCoy	Fel-Pro

IT IS on this 16th day of May, 2013 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

June 14, 2013 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.

June 28, 2013 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

June 14, 2013 Settlement demands shall be served on all counsel and the Special Master by this date.

July 10, 2013 The Settlement Conference previously scheduled on this date is **CANCELLED**.

SUMMARY JUDGMENT MOTION PRACTICE

July 12, 2013 Summary judgment motions limited to product identification issues shall be filed no later than this date.

August 9, 2013 Last return date for product identification summary judgment motions.

OTHER MOTION

July 12, 2013 Filing date.

August 9, 2013 Return date.

MEDICAL DEFENSE

August 16, 2013 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

LIABILITY EXPERT REPORTS

July 31, 2013 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.

August 30, 2013 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

September 13, 2013 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 29, 2013 @ 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.

September 30, 2013

Trial Date. (*The July 29, 2013 trial is adjourned to this date.*)

Plaintiff's counsel shall serve a copy of this Order upon any additional counsel immediately upon receipt.

/s/ Vincent Le Blon
VINCENT Le BLON, J.S.C.

cc: Clerk, Mass Tort
Brody Deposition Services
Priority One