

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

Docket No: L-1959-12 (AS)

Civil Action

CASE MANAGEMENT ORDER II

ESTATE OF GEORGE ANDERSON, <i>Plaintiff(s),</i>
vs.
AJ FRIEDMAN SUPPLY CO., 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 October 5, 2015:

FIRM	ATTORNEY	CLIENT
Wilentz Goldman & Spitzer	Jon G. Kupilik	Plaintiff(s)
Carroll McNulty Kull	Randall S. Watts	Spriax
Hack Piro	Robert Alencewicz	Johansen
Langsam Stevens	Lauren Strebel	Zy-Tech
Margolis Edelstein	Justin M. Bettis	Central Jersey Supply; United Engineers; Industrial Rubber; DVCC; Woolsulate
McElroy Deutsch	Joseph D. Rasnek	Flowserve US, Inc. as successor to Rockwell
McGivney Kluger	Thomas McNulty	John Wallace & Co.; Sloan
Ounan & Quinn for Speziali	Michael Quinn	General Electric
Schnader Harrison	Matthew Tamasco	E&B Mill Supply
Tierney Law Office	Kevin M. Buttery	Elizabeth Industrial Supply
Vasios Kelly	Thomas J. Kelly, Jr.	Bird
Wilson Elser	Joseph Hanlon	Metallo

IT IS on this 7th day of **October, 2015** *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.

EARLY SETTLEMENT

December 18, 2015 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

October 23, 2015 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

November 6, 2015 Summary judgment motions shall be filed no later than this date.

December 4, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

December 11, 2015 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

February 19, 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

January 15, 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.

February 19, 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.

EXPERT DEPOSITIONS

March 4, 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 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

March 2, 2016 @ 9:30am 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 28, 2016 Trial 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