

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

Docket No: L-3809-12 (AS)

Civil Action

CASE MANAGEMENT ORDER XI

GAIL ANDRU (Estate of Andrew & Dorothy Nelson), vs. 3M COMPANY, et al	<i>Plaintiff(s),</i> <i>Defendant(s).</i>
--	--

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on August 31, 2017:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s)
Budd Lerner	Terence W. Camp	Ericsson, Inc.
Caruso Smith	Stacey Lee Trien	Union Carbide; CertainTeed
Day Pitney	Sylvia-Rebecca Gutierrez	Phelps Dodge Ind.
Forman Watkins	Nicole Diesa	Cooper Industries
Harris Beach	David Dino	Progress Lighting; Hubbell Inc.; Hubbell Power Systems
Hoagland Longo	Jillian Madison	Exteco; WW Grainger
Kelley Jasons	Robert T. Connor Angela Caliendo	Square D Victaulic; Northern Pump; McNally
Leader & Berkon	Christine Bucca	Spirax Sarco
Lynch Daskal	Elissa Regev	Georgia Pacific
Margolis Edelstein	Jeff Hall-Gale	Belden; Alpha Wire; John Crane
Marks O'Neill	Sophia Piris	Whirlpool Corp.; Columbia Boiler
Marshall Dennehey	Arthur Bromberg Paul Johnson	Warren Pumps; RSCC Wire & Cable; AIW; Leviton
Mayfield Turner	Sara Satltsman	Carrier Corp.
McCarter & English	John C. Garde	Hercules; Ashland, Inc.
McElroy Deutsch	Andrew F. Bain	Allen-Bradley; Burnham; Eaton; Tyco
Pascarella DiVita	Madelyn Iulo	Trane; General Cable; Crane; Deming Pumps (a division of Crane Pump System)
Porzio Bromberg	Diane Averell	DuPont
Reilly Janiczek	Adrianna Exler	Aurora; Cleaver Brooks; CR Daniels; Goulds Electronics; Samson Electric Supply; General Wire
Salmon Ricchezza	Tim Schipske	AGCO Corp.
Vasios Kelly	Thomas J. Kelly, Jr.	Bird, Inc.
Wilbraham Lawler	Matthew Jones	Buffalo Pumps; Siemens
Segal McCambridge	Alexander Schaffel	National Lighting
McCullough Ginsberg	Jason Schmolze	Okonite
Gibbons	Alan Gries	Selby
Barry McTiernan & Moore	Graham Goring	NJ Plumbing Supply
McGivney Kluger	Caitlin Bodtmann Joel Clark	Nash Engineering; Simplex Wire; Taco; CCX; Gardner Denver; Flowserve; Treadwell; Graybar

IT IS on this 6th day of September, 2017 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

December 29, 2017 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.

December 29, 2017 Depositions of corporate representatives shall be completed by this date.

SUMMARY JUDGMENT MOTION PRACTICE

January 5, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

January 19, 2018 Summary judgment motions shall be filed no later than this date.

February 16, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

April 27, 2018 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

LIABILITY EXPERT REPORTS

March 16, 2018 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.

April 27, 2018 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

March 16, 2018 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.

April 27, 2018 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

May 25, 2018 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

February 27, 2018 @ 10:00am 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.

May 10, 2018 @ 10:00am 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.

June 18, 2018 Trial Date. (*The March 26, 2018 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