

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

Docket No: L-1975-12 (AS)

Civil Action

CASE MANAGEMENT ORDER IV

DAWN AUBE (Estate of Joseph Claffy), vs. 3M COMPANY, et al	<i>Plaintiff(s),</i> <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 June 11, 2015:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Keven Friedman	Plaintiff(s)
Caruso Smith	Richard Picini	HB Fuller; Union Carbide
Goldfein & Joseph	Madhurika Jeremiah	ACL; Atlas
Kent McBride	Charles Savoth	Mooney
Margolis Edelstein	J. Edmund Bryak	John Carne, Inc.; Central Jersey
McGivney Kluger	Caitlin Christie	Madsen & Howell; Raritan Supply
Schnader Harrison	Carol N. Kotsinis	E&B Mill Supply
Tierney Law Office	Mark Turner	Elizabeth Industrial Supply

IT IS on this 15th day of June, 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*.

DISCOVERY

August 14, 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.

August 14, 2015 Depositions of corporate representatives shall be completed by this date.

SUMMARY JUDGMENT MOTION PRACTICE

August 28, 2015 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

September 11, 2015 Summary judgment motions shall be filed no later than this date.

October 9, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

November 16, 2015 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.**

EXPERT DEPOSITIONS

December 11, 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

December 15, 2015 @ 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.

January 11, 2016 Trial Date. *(The June 29, 2015 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