

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

Docket No: L-900-14 (AS)

Civil Action

CASE MANAGEMENT ORDER VI

NANCY CAIRO, vs. AMERICAN INTERNATIONAL IND., 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 December 22, 2015:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph J. Mandia	Plaintiff(s)
Caruso Smith	Lisa Massimi	Union Carbide; CertainTeed
Fornaro Francioso	Richard Fornaro	Yardville Supply
Gordon & Silber	Lawrence S. Wasserman	American International
Lynch Daskal	Alexandra Ober	Georgia Pacific
Marshall Dennehey	Paul Johnson	Kaiser Gypsum

IT IS on this 22nd day of **December, 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

February 29, 2016 Depositions of corporate representative depositions shall be completed by this date.

EARLY SETTLEMENT

April 22, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

March 18, 2016 Summary judgment motions shall be filed no later than this date by those defendants permitted by the court to re-file their motions.

April 15, 2016 Last return date for summary judgment motions.

LIABILITY EXPERT REPORTS

March 31, 2016 Plaintiff shall serve supplemental expert reports, if any, by this date.

May 2, 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

May 27, 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 16, 2016 The settlement conference previously scheduled on this date is **cancelled**.

May 4, 2016 @ 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 13, 2016 Trial Date. (*The April 18, 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