

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

Docket No: L-900-14 (AS)

Civil Action

CASE MANAGEMENT ORDER VII

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 March 7, 2016:

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	Lisa Only	Kaiser Gypsum

IT IS on this 8th day of March, 2016 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 7, 2016 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 7, 2016 Depositions of corporate representative depositions shall be completed by this date.

EARLY SETTLEMENT

August 19, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

July 8, 2016 Summary judgment motions shall be filed no later than this date by those defendants permitted by the court to re-file their motions.

August 5, 2016 Last return date for summary judgment motions.

LIABILITY EXPERT REPORTS

July 7, 2016 Plaintiff shall serve supplemental expert reports, if any, by this date.

September 9, 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

September 30, 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

May 4, 2016 The settlement conference previously scheduled on this date is **cancelled**.

September 14, 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.

October 24, 2016 Trial Date. (*The June 13, 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