

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

Docket No: L-849-19 (AS)

Civil Action

CASE MANAGEMENT ORDER I

LAWRENCE CARAMIA (Estate of John Caramia), vs. BLACKMER PUMP, 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 July 16, 2019:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s)
Leader Berkon	Christine Bucca	IMO Industries
McGivney Kluger	Thomas McNulty	Blacker Pump
Pascarella DiVita	Madelyn Iulo	Ingersoll Rand
Reilly McDevitt	Ryan Notarangelo	Cleaver Brooks
Speziali Greenwald	Joanne Hawkins	General Electric
Tanenbaum Keale	Joanne Hawkins	CBS Corp.
Turner O'Mara	Dave J. Gallacher	Carrier Corp.

IT IS on this 17th day of **July 2019**, *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.

Defense counsel shall notify plaintiff's counsel within thirty (30) days of the date of this Order if their client was incorrectly named in the Complaint. Counsel may be barred from raising this defense at a later time for failure to comply.

Any jurisdictional motions must be filed in accordance with the Court Rules or be waived.

Any *forum non conveniens* motions must be filed as soon as practicable; once sufficient discovery is conducted so that the motion may be properly brought.

DISCOVERY

- | | |
|-----------------|---|
| July 31, 2019 | Plaintiff shall serve answers to wrongful death interrogatories by this date. |
| August 9, 2019 | Defendants shall serve answers to standard interrogatories by this date. |
| August 23, 2019 | Plaintiff shall propound supplemental interrogatories and document requests by this date. |

October 4, 2019 Defendants shall serve answers to supplemental interrogatories and document requests by this date.

August 23, 2019 Defendants shall propound supplemental interrogatories and document requests by this date.

October 4, 2019 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

December 31, 2019 Depositions of corporate representatives shall be completed by this date.

January 31, 2020 Any and all documents responsive to Notices to Produce shall be produced 10 days in advance of a corporate representative's deposition, if not produced in accordance with deadlines set forth for responses to document requests.

EARLY SETTLEMENT

April 10, 2020 Settlement demands shall be served on all counsel and the Special Master by this date.

MEDICAL EXPERT REPORT

July 31, 2019 Plaintiff shall serve executed medical authorizations by this date.

March 31, 2020 Plaintiff shall serve medical expert reports by this date.

March 31, 2020 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

July 10, 2020 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

March 31, 2020 Plaintiff shall identify its liability experts and serve liability expert reports by this date or waive any opportunity to rely on liability expert testimony.

July 10, 2020 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.

SUMMARY JUDGMENT MOTION PRACTICE

April 10, 2020 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

April 24, 2020 Summary judgment motions shall be filed no later than this date.

May 22, 2020 Last return date for summary judgment motions.

EXPERT DEPOSITIONS

August 10, 2020 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

To be scheduled Settlement conference.

September 14, 2020 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