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

**Docket No: L-5394-11 (AS)** 

# EDWARD DEAN,

vs.

Plaintiff(s),

**Civil Action** 

WINFIELD MUTUAL HOUSING CORP., et al Defendant(s).

CASE MANAGEMENT ORDER IV

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz

and the following parties on April 15, 2015:

| FIRM             | ATTORNEY          | CLIENT  |
|------------------|-------------------|---|
| Rappa Law Office | Leonard Rappa     | Plaintiff(s)                                    |
| Hoagland Longo   | Jason R. Gosnell  | Winfield Mutual Housing Authority; Fred Vitica; |
|                  |                   | Denise Baldarama; Robert Peryea                 |
| McGivney Kluger  | Lawrence McGivney | D&S Abatement Inc.                              |

IT IS on this <u>15<sup>th</sup></u> day of <u>April, 2015</u>, *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**

| May 15, 2015       | Plaintiffs shall provide medical authorizations for providers identified in defendants' January 8, 2015 letter, as well as for Mr. Brooks, by this date. |  |  |
|--------------------|--|--|--|
| May 15, 2015       | Plaintiffs shall provide responses to Notice to Produce by this date.  |  |  |
| May 15, 2015       | Plaintiff, Nicholas Dean, shall provide answers to interrogatories by this date.   |  |  |
| May 15, 2015       | Defendants represented by the Hoagland firm shall serve answers to supplemental interrogatories and document requests by this date.                      |  |  |
| August 14, 2015    | Plaintiff depositions shall be concluded by this date.   |  |  |
| September 14, 2015 | Fact discovery, including depositions, shall be completed by this date.  |  |  |
| September 14, 2015 | Depositions of defendant representatives shall be completed by this date.  |  |  |

## SUMMARY JUDGMENT MOTION PRACTICE

- January 8, 2016 Last date by which summary judgment motions may be filed.
- February 5, 2016 Last return date for summary judgment motions.

#### **MEDICAL DEFENSE**

- September 14, 2015 The defense medical examination of plaintiffs shall be completed by this date.
- October 30, 2015 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

## LIABILITY EXPERT REPORTS

- October 30, 2015 Plaintiff shall identify its liability experts and serve liability expert reports by this date.
- November 30, 2015 Defendants shall identify its liability experts and serve liability expert reports by this date.

#### **EXPERT DEPOSITIONS**

December 31, 2015 Expert depositions shall be completed by this date.

#### PRE-TRIAL AND TRIAL

To be scheduled Settlement conference.

February 29, 2016 Trial Date.

Plaintiff's counsel shall serve a copy of this Order upon any additional counsel immediately upon receipt.

/s/Ana C. Víscomí ANA C. VISCOMI, J.S.C.

cc: Clerk, Mass Tort Brody Deposition Services Priority One