

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

Docket No: L-5750-13 (AS)

Civil Action

CASE MANAGEMENT ORDER III

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| ROBERT ECRET, SR., vs. ALCOA INC., et al | <i>Plaintiff(s),</i> <i>Defendant(s).</i> |
|--|--|

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on March 14, 2018:

| FIRM | ATTORNEY | CLIENT |
|------------------|------------------|---------------|
| Napoli Shkolnik | W. Steven Berman | Plaintiff(s) |
| Landman Corsi | Colin Be | Bechtel |
| Wilbraham Lawler | Matthew Jones | PSE&G Nuclear |

IT IS on this 14th day of March, 2018, *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

- March 16, 2018 Plaintiff shall propound supplemental discovery by this date.
- April 30, 2018 Defendants shall serve answers to supplemental interrogatories and document requests by this date.
- March 23, 2018 Defendants shall propound supplemental discovery by this date.
- April 30, 2018 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- June 29, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

- July 13, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- August 31, 2018 Summary judgment motions shall be filed no later than this date.
- September 28, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

October 31, 2018 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

August 15, 2018 Plaintiff shall identify its liability experts and serve liability expert reports or a certified expert statement by this date or waive any opportunity to rely on liability expert testimony.

October 31, 2018 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

November 16, 2018 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

November 9, 2018 @ 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.

December 10, 2018 Pretrial Information Exchange submissions due.

December 17, 2018 Trial-Ready 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