

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

Docket No: L-4593-12 (AS)

Civil Action

CASE MANAGEMENT ORDER IV

THOMAS & DONNA GIOGLIO, <i>Plaintiff(s),</i> vs. 3M COMPANY, et al <i>Defendant(s).</i>

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on September 16, 2014:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph J. Mandia	Plaintiff(s)
Caruso Smith	Marcia DePolo	Union Carbide
Gibbons P.C.	Ethan Stein	Honeywell
Kirkland & Ellis	Dnaiel A. Bress	BASF (National Counsel)
Littleton Joyce	Christine M. Delaney	BASF
Mattson Madden Leith	John R. Leith	Okonite

IT IS on this 17th day of **September, 2014** 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.

MISCELLANEOUS

Plaintiff's counsel shall provide a date for Mr. Fitzgerald's deposition no later than September 26, 2014.

Defendant BASF may serve supplemental liability expert reports by experts previously disclosed, if any, within twenty days of Mr. Fitzgerald's deposition.

EXPERT DEPOSITIONS

December 31, 2014 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

January 21, 2015	<i>In limine</i> motions shall be filed by this date.
February 6, 2015	Return date for <i>in limine</i> motions.
March 2, 2015	Trial Date. <i>Pretrial Information Exchange shall be due ten (10) days prior to the scheduled trial date.</i>

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
Brody Deposition Services
Priority One