

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

Docket No: L-3600-16 (AS)

Civil Action

CASE MANAGEMENT ORDER II

MICHELE HOLLAND (Estate of Edward Prezwodek), vs. ABB INC., 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 December 4, 2017:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s)
Forman Watkins	Nicole Diesa	Cooper Industries
Kelley Jasons	Angela Caliendo	Schneider Electric f/k/a Square D
Littleton Park	Christine M. Delany	McMaster-Carr
Mandelbaum Salsburg	Yale Lazris	Turtle & Hughes
Margolis Edelstein	Jeffrey Hall-Gale	Woolsulate; Central Jersey Supply
Marshall Dennehey	Paul Johnson	Riley Power
McCullough Ginsberg	Jason Schmolze	Okonite
McElroy Deutsch	Stephanie Lopez	Cutler Hammer; Rockwell Automation
McGivney Kluger	Joel Clark	Bergan Industrial; Madsen & Howell; Graybar Electric; Jewel Electric Supply; Griffith Electric Supply
O'Brien Firm	Tracy Cabbage	ABB Inc.
Pascarella DiVita	Joshua Greeley	Ingersoll Rand
Porzio Bromberg	Michelle Burke	Wyeth Holdings, LLC
Reilly Janiczek	Adrianna Exler	Gould Electronics Inc., Samson Electrical Supply; E.W. Berger
Speziali Greenwald c/o Tanenbaum Keale	Pamela R. Kaplan	General Electric
Tanenbaum Keale	Pamela R. Kaplan	CBS/ Westinghouse, Wesco, Foster Wheeler
Tierney Law Firm	Brian Garbaez	Elizabeth Industrial

IT IS on this 5th day of **December, 2017**, 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

February 28, 2018 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.

February 28, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

March 16, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

March 16, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

March 30, 2018 Summary judgment motions shall be filed no later than this date.

April 27, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

January 19, 2018 Plaintiff shall serve medical expert reports by this date.

January 19, 2018 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

June 29, 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

April 30, 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.

June 29, 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.

ECONOMIST EXPERT REPORTS

April 30, 2018 Plaintiff shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

June 29, 2018 Defendants shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

EXPERT DEPOSITIONS

July 27, 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

August 1, 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.

August 20, 2018 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