

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

Docket No: L-2720-16 (AS)

Civil Action

CASE MANAGEMENT ORDER VI

ESTATE of DANIEL HUGHES, <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 June 18, 2018:

FIRM	ATTORNEY	CLIENT
Locks Law Firm	Melanie Garner	Plaintiff(s)
Dilworth Paxon	Frank Maneri	Marshall & Sons, Inc. t/a The Fireplace People
Lewis Brisbois	Troy Cunnunham	Henkel Corp.
Littleton Park	Jason Schmitz	BASF
Marshall Dennehey	Adam Fogarty	Pep Boys
McGivney Kluger	Thomas McNulty	Weil McLain
Methfessel & Werbel	Olivia R. Licata	Toots Lee Automotive Supplies, Inc.
Rawle Henderson	Paul Smyth	Hajoca; Billows Electrical Supply
Segal McCambridge	Uri Carni	Southwire
Speziali Greenwald	Joanne Hawkins	UHR Electrical Supply
Wilbraham Lawler	Lynn E. Roberts, III	RH Peterson; Broudy; Siemens Industry, Inc.

IT IS on this 18th day of June, 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

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|-----------------|---|
| June 29, 2018 | Defense counsel shall provide 2 or 3 dates for the depositions of their corporate representatives by this date. |
| July 9, 2018 | Plaintiff shall serve answers to supplemental interrogatories and document requests by this date. |
| August 17, 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. |

August 17, 2018 Depositions of corporate representatives shall be completed by this date.

SUMMARY JUDGMENT MOTION PRACTICE

August 24, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

September 14, 2018 Summary judgment motions shall be filed no later than this date.

October 12, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

August 17, 2018 Plaintiff shall serve a wrongful death expert report by this date.

November 30, 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 17, 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.

November 30, 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

August 17, 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.

November 30, 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 DEPOSITION

December 31, 2018 Expert depositions shall be completed as agreed upon by counsel. Counsel shall cooperate in scheduling depositions and shall contact court, if necessary. 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

September 18, 2018 The settlement conference previously scheduled on this date is **cancelled**.

October 25, 2018 The settlement conference previously scheduled on this date is **cancelled**.

December 14, 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.

January 28, 2019 Trial Date. (*The November 26, 2018 trial is adjourned to this 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