

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

**Docket No:** L-2995-17 (AS)

**Civil Action**

**CASE MANAGEMENT ORDER IV**

JOSEPH JACONIA (Estate of Lamona Jaconia),  vs.  3M COMPANY, 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 August 7, 2018:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s)
Breuninger Fellman	Kathleen Ramalho	Genuine Parts Co.; National Automotive Parts Assoc.
Connell Foley	Timothy Corriston	Colgate / Mennen
Gibbons	Daniel Dorfman	Honeywell
Goldberg Segalla	David Rutkowski	Robert Bosch; Avco Corp.; Navistar
Harwood Lloyd	Leidy Gutierrez	Carlisle
Hawkins Parnell	Manuel A. Guevara	Paccar; Bridgestone
Lavin O'Neil	Leland Kellner	Toyota Motor Sales, USA, Inc.
LeClair Ryan	Gary M. Sapir	Ford Motor Co.
Lynch Daskal	Andrew Mundo	Nissen North America, Inc.
McCarter & English	Debra M. Perry	Johnson & Johnson
McElroy Deutsch	Joseph D. Rasnek	Pfizer
McGivney Kluger	Pooja Patel	Midas; Whittaker Clark & Daniels
Norris McLaughlin	Eric Alvarez	Blue Bird Body Co.
O'Toole Scrivo	Leslie Lombardy	Dana Co.
Rawle Henderson	Paul Smyth	Imerys Talc America; Imerys USA; Imerys Talc Vermont
Reilly Janiczek	Ryan Notarangelo	Maremont Corp.; ArvinMeritor
Rivkin Radler	Jacqueline Bushwack	Avon Products Inc.
Segal McCambridge	Dinesh Dadlani	Chattem, Inc.
Speziali Greenwald	Joanne Hawkins	General Electric
Tanenbaum Keale	Pamela R. Kaplan	Borg Warner
Wilbraham Lawler	Lynn E. Roberts, III	Cummins

IT IS on this 8<sup>th</sup> day of August, 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**

November 9, 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.

December 7, 2018 Depositions of corporate representatives shall be completed by this date.

## **EARLY SETTLEMENT**

March 29, 2019 Settlement demands shall be served on all counsel and the Special Master by this date.

## **SUMMARY JUDGMENT MOTION PRACTICE**

February 1, 2019 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

February 15, 2019 Summary judgment motions shall be filed no later than this date.

March 15, 2019 Last return date for summary judgment motions.

## **MEDICAL DEFENSE**

January 11, 2019 Plaintiff shall serve medical expert reports by this date.

January 11, 2019 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

April 30, 2019 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**

January 11, 2019 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.

April 30, 2019 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**

January 11, 2019 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.

April 30, 2019 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**

May 31, 2019 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**

December 13, 2018	The settlement conference previously scheduled on this date is <b>cancelled</b> .
February 21, 2019	The settlement conference previously scheduled on this date is <b>cancelled</b> .
To be scheduled	Settlement conference.
June 24, 2019	Trial Date. <i>(The March 18, 2019 trial is adjourned to this 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