

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

Docket No: L-2995-17 (AS)

Civil Action

CASE MANAGEMENT ORDER V

JOSEPH JACONIA (Estate of Lamona Jaconia), vs. 3M COMPANY, 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 November 27, 2018:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Brendan Little	Plaintiff(s)
Breuninger Fellman	Kathleen Ramalho	Genuine Parts Co.; National Automotive Parts Assoc.
Connell Foley	Timothy Corriston	Colgate / Mennen
Cozzen O'Connor	Amanda Thai	Reddaway Mfg. Co.
Gibbons	Daniel Dorfman	Honeywell
Gibbons	Robert Brown	Chattem, Inc.
Goldberg Segalla	Elizabeth Weill	Robert Bosch; Avco Corp.; Navistar, Inc.
Harwood Lloyd	Victoria Silva	Carlisle
Hawkins Parnell	Roy Viola	Paccar; Bridgestone
Lavin O'Neil	Rachel Lamb	Toyota Motor Sales, USA, Inc.
LeClair Ryan	Gary M. Sapir	Ford Motor Co.
Lynch Daskal	Andrew Mundo	Nissan North America, Inc.
McCarter & English	Debra Perry	Johnson & Johnson
McElroy Deutsch	Nancy McDonlad	Pfizer
McGivney Kluger	Pooja Patel	Midas; Whittaker Clark & Daniels
Norris McLaughlin	Michael Wise	Blue Bird Body Co.
O'Toole Scrivo	Gary Van Lieu	Dana Co.
Rawle Henderson	Samuel Garson	Imerys Talc America; Imerys USA; Imerys Talc Vermont
Reilly McDevitt	Ryan Notarangelo	Maremont Corp.; ArvinMeritor
Rivkin Radler	Brian Schlosser	Avon Products Inc.
Tanenbaum Keale	Afigo Fadahunsi	Borg Warner
Wilbraham Lawler	Anisha Abraham	Cummins

IT IS on this 28th day of **November, 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

- January 15, 2019 Plaintiff shall serve answers to supplemental discovery propounded by Colgate/Mennen by this date.
- February 28, 2019 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, 2019 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

- June 28, 2019 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- May 10, 2019 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.
- May 24, 2019 Summary judgment motions shall be filed no later than this date.
- June 21, 2019 Last return date for summary judgment motions.

MEDICAL DEFENSE

- April 18, 2019 Plaintiff shall serve medical expert reports by this date.
- April 18, 2019 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.
- July 31, 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

- April 18, 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.
- July 31, 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

- April 18, 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.
- July 31, 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

August 30, 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

To be scheduled Settlement conference.

September 30, 2019 Trial Date. (*The June 24, 2019 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