

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

**Docket No:** L-2894-17(AS)

**Civil Action**

**CASE MANAGEMENT ORDER I  
AMENDED**

RAYMOND KEATING,  vs.  AIR & LIQUID SYSTEMS CORP., et al	<i>Plaintiff(s),</i>    <i>Defendant(s).</i>
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*This matter having previously come in for a Case Management Conference before Special Master Agatha N.*

*Dzikiewicz and the following parties on August 22, 2017:*

<b>FIRM</b>	<b>ATTORNEY</b>	<b>CLIENT</b>
<i>Belluck &amp; Fox</i>	<i>James Long</i>	<i>Plaintiff(s)</i>
<i>Busch &amp; Busch</i>	<i>Gregory Busch</i>	<i>Industrial Valve</i>
<i>Caruso Smith</i>	<i>Lisa Massimi</i>	<i>Union Carbide; CertainTeed</i>
<i>Connell Foley</i>	<i>Scott Press</i>	<i>Palermo Supply; Plibrico Sales &amp; Service Co.</i>
<i>Cullen &amp; Dykeman</i>	<i>Austin O'Malley</i>	<i>Howden Buffalo</i>
<i>Delany McBride</i>	<i>Ariana Seidel</i>	<i>Peerless Industries</i>
<i>Garrity Graham</i>	<i>Stephen Balsamo</i>	<i>United Conveyor Corp.</i>
<i>Hoagland Longo</i>	<i>Jillian Madison</i>	<i>York International; Frick Co.</i>
<i>Kelly Jasons</i>	<i>Angela Caliendo</i>	<i>Square D</i>
<i>Landman Corsi</i>	<i>Fay Szakal</i>	<i>ECR/Dunkirk</i>
<i>Leader &amp; Berkon</i>	<i>Christine Bucca</i>	<i>Electrolux Home Products; Spirax Sarco</i>
<i>Margolsi Edelstein</i>	<i>Dawn Dezii</i>	<i>Woolsulate; Central Jersey Supply; Ideal Supply; Industrial Supply; Goodrich Corp.</i>
<i>Marshall Dennehey</i>	<i>Paul Johnson</i>	<i>Warren Pumps</i>
<i>Mayfield Turner</i>	<i>Sara Saltsman</i>	<i>Riggs Distler</i>
<i>McElroy Deutsch</i>	<i>Joseph D. Rasnek</i>	<i>Flowsolve US Inc.; Asco Controls; Foxboro</i>
<i>McGivney Kluger</i>	<i>Caitlin Bodtmann</i>  <i>Thomas McNulty</i>	<i>Raritan Supply; Nash Engineering; Atwood &amp; Morrill; Courter &amp; Co.; Alltite Gasket Fairbanks; Weil McLain; Zurn; Gardner Denver; Ward Leonard Electric</i>
<i>Pascarella DiVita</i>	<i>Inge B. Cully</i>	<i>Crane Co.</i>
<i>Rawle &amp; Henderson</i>	<i>Paul Smyth</i>	<i>American Biltrite; Hajoca</i>
<i>Reilly Janiczek</i>	<i>Zachary Green</i>	<i>Aurora Pump; Cleaver Brooks</i>
<i>Segal McCambridge</i>	<i>Nisha S. Lakhani</i>	<i>BW/IP</i>
<i>Tanenbaum Keale</i>	<i>Maryam Meseha</i>	<i>Borg Warner; CBS/Westinghouse; Foster Wheeler; General Electric; Research Cottrell</i>
<i>Vasios Kelly</i>	<i>Brooke Anderson</i>	<i>Armstrong International; Argo</i>
<i>Wilbraham Lawler</i>	<i>Tristin Fabro</i>	<i>Air &amp; Liquid Systems; Greene Tweed; South Amboy Plumbing Supply</i>

IT IS on this 12<sup>th</sup> day of December, 2017, that Case Management Order I is hereby;

**AMENDED** 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 30, 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.
- January 30, 2018 Depositions of corporate representatives shall be completed by this date.

### **EARLY SETTLEMENT**

- December 22, 2017 Settlement demands shall be served on all counsel and the Special Master by this date.

### **SUMMARY JUDGMENT MOTION PRACTICE**

- February 2, 2018 Summary judgment motions shall be filed no later than this date.
- March 2, 2018 Last return date for summary judgment motions.

### **MEDICAL DEFENSE**

- January 12, 2018 Plaintiff shall serve medical expert reports by this date.
- January 12, 2018 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.
- March 16, 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**

- January 12, 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.
- March 16, 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.

### **EXPERT DEPOSITIONS**

- March 30, 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**

April 6, 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.

April 20, 2018 Pretrial Information Exchange submissions due.

April 30, 2018 Trial-Ready 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