

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

Docket No: L-5516-16 (AS)

Civil Action

CASE MANAGEMENT ORDER V

STEPHEN KOPP III and CAROL KOPP, <i>Plaintiff(s),</i>
vs.
BRIDGESTONE FIRESTONE NORTH AMERICA TIRE, LLC, 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 April 4, 2018:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s)
Breuninger & Fellman	Raymond Chow	Genuine Parts Co.; National Automotive Parts Assoc.; TMD Friction Inc.
Budd Lerner	Terence Camp	Goodyear Tire & Rubber Co.
Caruso Smith	Alexandra Caruso	Union Carbide
Delany McBride	Ariana Seidel	Hitachi Automotive Systems America; Hitachi Chemical Co.
Gibbons PC	Daniel Dorfman	Honeywell International Inc.
Goldberg Segalla	Leah A. Brndjar	Navistar
Greenbaum Rowe	Brian Kornbrek	American Honda Motor Co., Inc.
Hawkins Parnell	Manuel A. Guevara	Pneumo Abex
Kaufmann Borgeest	Neeпа Patel	Morton International
Landman Corsi	Alexander Imel	Fel-Pro
Lavin O'Neil	Leland Kellner	Toyota Motor Sales, USA; Sumitomo Electric USA; Mazda North American Operations, Inc.
LeClair Ryan	Gary M. Sapir	Ford
Lynch Daskal	Daniel Gagliardi	Luk Clutch Systems; Nissan North America, Inc.
Margolis Edelstein	Dawn Dezii	Goodrich Corp.
McElroy Deutsch	Michelle Hydrusko	ExxonMobil Corp.
McGivney Kluger	Caitlin Bodtmann	ZF North American, Inc.
O'Toole Scrivo	Glenn Chew	Akebono Brake
Rawle & Henderson	Paul Smyth	Hennessy
Reilly McDevitt	Zachary Green	Maremont
Tanenbaum Keale LLP	Afigo Fadahunsi	Borg Warner
Troutman Sanders	Joanne P. Rogers	Standard Motor Products
Wilbraham Lawler	Anisha S. Abraham	Kelsey Hayes, Western Auto
Wilson Elser	Joseph Hanlon	Texaco

IT IS on this 11th day of April, 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

- June 29, 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.
- June 29, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

- July 20, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- July 20, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.
- August 3, 2018 Summary judgment motions shall be filed no later than this date.
- August 31, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

- April 30, 2018 Plaintiff shall serve medical expert reports by this date.
- April 30, 2018 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.
- December 7, 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

- October 5, 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.
- December 7, 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

- January 18, 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

October 30, 2018 @ 1:30pm 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 16, 2019 @ 1:30pm 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.

February 25, 2019 Trial Date. (*The December 3, 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