

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

Docket No: L-6245-17 (AS)

Civil Action

CASE MANAGEMENT ORDER I

GEORGE & DIANE LINK,	<i>Plaintiff(s),</i>
vs.	
ABB INC., 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 5, 2018:

FIRM	ATTORNEY	CLIENT
Maune Raichle	Patrick Timmins	Plaintiff(s)
Barry McTiernan Wedinger	Cara Manz	Fulton Boiler Works, Inc.
Breuninger & Fellman	Raymond Chow	Genuine Parts Co.
Budd Lerner	Terence Camp	Ericsson, Inc.
Caruso Smith	Alexandra Caruso	Union Carbide; CertainTeed
Clemente Mueller	Dmitry Lupin	WM Powell Co.
Clyde & Co.	Kevin Turbert	Burnham LLC
Cullen and Dykman LLP	John J. Burbridge	Howden North America, Inc.
Darger Errante	Mark Friesz	Lightolier; Peerless Lighting
Delany McBride	Ariana Seidel	Feldman Brothers Electric Supply; Peerless
Eckert Seamans	Christopher Bladel	AO Smith Water Products Co.
Gibbons PC	Daniel Dorfman	Honeywell International
Hack Piro	Robert Alencewicz	Fischbach & Moore
Harris Beach	David Kochman	Progress Lighting Co.; Prescolite Inc.; Hubbell Power Systems
Hawkins Parnell	Manuel A. Guevara	O'Conner Constructors Inc.; Ericsson Inc.; Rockbestos
Hoagland Longo	Jullian Madison	Johnson Controls; Monarch Electric; Exteco; Warshaure Electric
Jones Law Office	Richard Jones	Metropolitan Life
Kelley Jasons	Michael Pastrak	Sterling Fluid Systems; Schneider Electric f/k/a Square D; FMC Corp (former Peerless Pump Co.
Kent McBride	Francine M. dimter	Mines Safety Appliances
Landman Corsi	Colin P. Be	US Steel
Leader & Berkon	Christine Bucca	IMO Ind.; Spirax Sarco
Littleton Park	Christine Emery	BASF
Margolis Edelstein	Dawn Dezii	Beldon Wire & Cable; Alpha Wire; Aurora Electrical Supply; Newark Ironbound Electric Supply; Wayne Electrical Supply
Maron Marvel	Timothy Coughlan	Velan Valve Corp.
Marshall Dennehey	Paul Johnson	Riley Stoker; Warren Pumps; Cooper Industries; RSCC Wire & Cable; American Insulated Wire

McElroy Deutsch	Stephanie Lopez	Burnham; Rockwell Automation; Cutler Hammer; Vulsub II (incorrectly sued as Tyco Valves)
McGivney Kluger	Joel Clark Kevin Hoffman	Jewel Electric; Griffith Electric; Weil McLain; Taco; Durametallic; Grundfos; CCX; Gardner Denver; Durion; Graybar; Marley Cooling; Good Friend Electric
Morgan Melhuish	Deborah Banfield	Novartis
O'Brien Firm	Jodie J. Farrow	ABB Inc.
O'Toole Scrivo	Dennise E. Mejia	Swift Electrical; Cooper Electric; Hatzel & Buehler; Starwood Hotels & Resorts
Pascarella DiVita	John S. McGowan	Ingersoll Rand; Trane Co.; Crane Co.; General Cable Co.
Rawle & Henderson	Paul Smyth	Billows Electric Supply
Reilly McDevitt	Adrianna Exler	Keer Electric; Aurora Pump; Cleaver Brooks; Samson Electrical; General Wire; Gould Electronics Inc.
Styliades Mezzanotte	Brian Jeffers	Viking Pump
Tanenbaum Keale	Afigo Fadahunsi	Borg Waner; Bryant Electric; CBS Corp.; Foster Wheeler
Vasios Kelly	Thomas J. Kelly, Jr.	Armstrong International
Wilbraham Lawler	Anisha S. Abraham	Siemens Industry Inc.; PSEG

IT IS on this 12th 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.

Defense counsel shall notify plaintiff's counsel within thirty (30) days of the date of this Order if their client was incorrectly named in the Complaint. Counsel may be barred from raising this defense at a later time for failure to comply.

DISCOVERY

- | | |
|----------------|--|
| April 13, 2018 | Defendants shall serve answers to standard interrogatories by this date. |
| May 15, 2018 | Plaintiff shall propound supplemental interrogatories and document requests by this date. |
| June 15, 2018 | Defendants shall serve answers to supplemental interrogatories and document requests by this date. |
| May 15, 2018 | Defendants shall propound supplemental interrogatories and document requests by this date. |
| June 15, 2018 | Plaintiff shall serve answers to supplemental interrogatories and document requests by this date. |

September 28, 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.

October 15, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

February 4, 2019 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

November 30, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

December 28, 2018 Summary judgment motions shall be filed no later than this date.

January 25, 2019 Last return date for summary judgment motions.

MEDICAL DEFENSE

October 19, 2018 Plaintiff shall serve medical expert reports by this date.

February 28, 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

October 19, 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.

February 28, 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

October 30, 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.

February 28, 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

March 29, 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

March 13, 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.

April 22, 2019 Pretrial Information Exchange submissions due.

April 29, 2019 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