

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

Docket No: L-4647-13 (AS)

Civil Action

CASE MANAGEMENT ORDER X

| |
|---|
| ESTATE of GEORGE MARRAPODI, <i>Plaintiff(s),</i> |
| vs. |
| AJ FRIEDMAN SUPPLY CO., 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 November 25, 2019:

| FIRM | ATTORNEY | CLIENT |
|-------------------|--------------------|-------------------|
| Lanier Law Firm | Daniel LaTerra | Plaintiff(s) |
| Clyde & Co. | Kevin Turbert | Burnham |
| Hoagland Longo | Marc S. Gaffrey | Kohler |
| Landman Corsi | Lorraine Belostock | ECR International |
| Leader Berkon | Christine Bucca | Weil McLain |
| Pascarella DiVita | Stephanie DiVita | Crane Co. |

IT IS on this 25th day of **November 2019**, *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.

Any jurisdictional motions must be filed in accordance with the Court Rules or be waived.

Any *forum non conveniens* motions must be filed as soon as practicable; once sufficient discovery is conducted so that the motion may be properly brought.

DISCOVERY

February 28, 2020 Depositions of corporate representatives shall be completed by this date.

MEDICAL EXPERT REPORT

January 31, 2020 Plaintiff shall serve medical expert reports by this date.

March 31, 2020 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

March 31, 2020 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

April 30, 2020 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 14, 2020 @ 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.

June 1, 2020 Trial 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