

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

**Docket No: L-2882-12 (AS)**

**Civil Action**

**CASE MANAGEMENT ORDER II**

CHRISTOPHER MORELLI (Estate of Michelle Morelli),  <i>Plaintiff(s),</i>  vs.  HONEYWELL INTERNATIONAL INC., et al  <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 *December 6, 2013*:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Christopher Placitella	Plaintiff(s)
O'Toole Fernandez	Leslie Lombardy	RT Vanderbilt

IT IS on this 9<sup>th</sup> day of **December, 2013** *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 10, 2014      Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- January 31, 2104      Depositions of corporate representatives shall be completed by this date. **(All documents shall be served at least 10 days prior to the corporate representative's deposition.)**

**EARLY SETTLEMENT**

- December 31, 2013      Settlement demands shall be served on all counsel and the Special Master by this date.
- February 12, 2014      The settlement conference previously scheduled on this date is **CANCELLED**.

## **SUMMARY JUDGMENT MOTION PRACTICE**

February 28, 2014 Summary judgment motions limited to product identification issues shall be filed no later than this date.

March 28, 2014 Last return date for product identification summary judgment motions.

## **MEDICAL DEFENSE**

December 31, 2013 Plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

February 28, 2014 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

## **LIABILITY EXPERT REPORTS**

March 3, 2014 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.

April 4, 2014 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 4, 2014 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**

May 5, 2014 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 15, 2014 @ 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.

May 19, 2014

Trial Date. (*The March 3, 2014 trial is adjourned to this date.*)

**Plaintiff's counsel shall serve a copy of this Order upon any additional counsel immediately upon receipt.**

*/s/ Vincent Le Blon*  
VINCENT Le BLON, J.S.C.

cc: Clerk, Mass Tort  
Brody Deposition Services  
Priority One