# SUPERIOR COURT OF NEW JERSEY LAW DIVISION: MIDDLESEX COUNTY

### ASBESTOS LITIGATION

**Docket No:** L-4032-17 (AS)

GEORGE & PEARL PARRIS, Plan

Plaintiff(s),

#### **Civil Action**

#### CASE MANAGEMENT ORDER IV

3M COMPANY, et al

vs.

Defendant(s).

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and

the following parties on <u>August 14, 2018</u>; and counsel having agreed upon and requested certain extensions:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	William Kuzmin	Plaintiff(s)
Gibbons PC	Robert Brown	Sherwin Williams

IT IS on this <u>14<sup>th</sup></u> day of <u>AUGUST, 2018</u>, 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.

## EARLY SETTLEMENT

September 28, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

#### MEDICAL DEFENSE

November 2, 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

- August 14, 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.
- November 2, 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.

#### ECONOMIST EXPERT REPORTS

September 14, 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.

November 2, 2018 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

November 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

October 4, 2018	The settlement conference previously scheduled on this date is cancelled.
December 11 2018 @ 10.00em	Settlement conference. All defense counsel shall appear with authority to negotiate
December 11, 2018 @ 10.00am	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.
December 21, 2018	Pretrial Information Exchange submissions due.
January 7, 2019	Trial-Ready Date. (The November 13, 2018 trial is adjourned to this date.)

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

<u>/s/ Ana C. Víscomí</u> ANA C. VISCOMI, J.S.C. Clerk, Mass Tort cc: