

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

Docket No: L-5111-13(AS)

Civil Action

CASE MANAGEMENT ORDER VIII

DELIMIRO & LUZ PEREZ, vs. AMPACET CORP., et al	<i>Plaintiff(s),</i> <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 July 15, 2015:

FIRM	ATTORNEY	CLIENT
Lanier Law Firm	Darron Berquist	Plaintiff(s) Counsel <i>(co-counsel with Wilentz Goldman & Spitzer)</i>
Baginski Mezzanotte	Patricia Lyons	HM Royal
Hawkins Parnell	Roy Viola	Celanese
Kelley Jasons	Angela Caliendo	FMC; Gen Corp.
Littleton Joyce	Katherine Blok Galdieri	Ren / BASF Corp.
Locke Lord	Eric Alvarez	Alcatel-Lucent USA Inc.
Margolis Edelstein	Justin M. Bettis	CP Chemical
McElroy Deutsch	Michelle Hydrusko	Wallace & Tiernan USA Inc.; Allen Bradley
Pepper Hamilton	Jeff Carr	Honeywell International
Porzio Bromberg	Pamela Kaplan	DuPont; Cytec Engineered Materials; Wyeth Holdings; Eastman Chemical
Reilly Janiczek	Maura Murphy	GEI
Sedgwick LLP	Bridget Followay	CBS

IT IS on this 16th day of July, 2015 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

August 31, 2015 Depositions of fact witnesses Tedona, Szanati, Hernandez, and Brocos shall be completed by this date.

EARLY SETTLEMENT

September 8, 2015 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

September 11, 2015 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

September 25, 2015 Summary judgment motions shall be filed no later than this date.

October 23, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

August 31, 2015 Defendants shall serve expert medical reports no later than this date.

LIABILITY EXPERT REPORTS

September 18, 2015 Plaintiff shall serve amended/supplemental expert liability report, if any, by this date.

November 20, 2015 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.

December 4, 2015 Plaintiff shall identify its rebuttal liability experts and serve rebuttal liability expert reports, if any, by this date.

EXPERT DEPOSITIONS

January 8, 2016 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 21, 2015 The settlement conference previously scheduled on this date is **cancelled**.

November 20, 2015 @ 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.

January 25, 2016 Trial Date. (*The December 17, 2015 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
Brody Deposition Services
Priority One