

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

**Docket No:** L-562-18 (AS)

**Civil Action**

**CASE MANAGEMENT ORDER III**

ANN & PHILLIP RIPLEY,  vs.  BRENNTAG NORTH AMERICA, 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 April 17, 2019:

FIRM	ATTORNEY	CLIENT
Simon Greenstone	Leah Kagan	Plaintiff(s) <i>co-counsel with Szaferman Lakind</i>
Manning Gross Massenberg	Lindsay Weiss Karina Murski, Esq.	Chanel, Inc.
McCarter & English	Amanda M. Munsie	Johnson & Johnson; Johnson & Johnson Consumer
McGivney Kluger	Caitlin Bodtmann	Whittaker Clark & Daniels

IT IS on this 18<sup>th</sup> day of April 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.

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.

**LIABILITY EXPERT REPORTS**

- May 17, 2019            Plaintiff shall serve supplemental expert reports by Dr. Longo and Dr. Moline by this date.
- June 17, 2019            Defendants shall serve expert reports in response to Dr. Longo and Dr. Moline supplemental reports by this date.
- June 17, 2019            Chanel shall serve Mr. Segrave's expert report by this date.

**EXPERT DEPOSITIONS**

- July 15, 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**

May 31, 2019 @ 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.

August 12, 2019 Pretrial Information Exchange submissions due.

August 26, 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