

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

Docket No: L-7305-15 (AS)

Civil Action

CASE MANAGEMENT ORDER I

WILLIAM & CONNIE SAVAGE, <i>Plaintiff(s),</i>
vs.
AT&T CORPORATION, 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 March 29, 2016:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Dennis Geier	Plaintiff(s)
Caruso Smith	Alexandra Caruso	CertainTeed; Union Carbide
Connell Foley	Richard Jagen	Superior Welding Supply Co.
Gibbons	Christopher P. DePhillips	AT&T Corp.
Kelley Jasons	Daniel Daly	FMC Corp.
Kent McBride	Ravi Shah	Binsky & Snyder; Mooney Bros.; Koenig
Margolis Edelstein	Dawn Dezii	Central Jersey Supply
Marshall Dennehey	Paul Johnson	Warren Pumps
McGivney Kluger	Marc J. Wisel	Raritan Supply; Brand Insulation; DAP; Flowserve
Pascarella DiVita	Lisa Pascarella	Ingersoll Rand
Speziali Greenwald	Joanne Hawkins	Foster Wheeler; CBS; General Electric
Swartz Campbell	William Morlok	Allied Glove
Tierney Law Offices	Mark Turner	Elizabeth Industrial Supply Co.
Wilbraham Lawler	Tristin Fabro	Green Tweed; Air & Liquid Systems Corp.

IT IS on this 4th day of **April, 2016**, 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.

DISCOVERY

April 15, 2016 Plaintiff shall serve answers to standard interrogatories, provide the information required by paragraph VII.B.1.a. of the General Order, and shall advise defendants whether the plaintiff is available for deposition and, if not, the reasons therefore by this date.

May 13, 2016 Defendants shall serve answers to standard interrogatories by this date.

May 31, 2016 Plaintiff shall propound supplemental interrogatories and document requests by this date.

July 1, 2016 Defendants shall serve answers to supplemental interrogatories and document requests by this date.

May 31, 2016 Defendants shall propound supplemental interrogatories and document requests by this date.

July 1, 2016 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

September 30, 2016 Plaintiff depositions shall be concluded by this date. Plaintiff's counsel shall contact the Special Master within one week of this deadline if plaintiff depositions are not completed by this date.

November 30, 2016 Fact discovery, including depositions, shall be completed by this date. Plaintiff's counsel shall contact the Special Master within one week of this deadline if all fact discovery is not completed.

December 30, 2016 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

January 13, 2017 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

January 20, 2017 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

February 3, 2017 Summary judgment motions shall be filed no later than this date.

March 3, 2017 Last return date for summary judgment motions.

MEDICAL DEFENSE

April 29, 2016 Plaintiff shall serve executed medical authorizations by this date.

April 15, 2016 Plaintiff shall serve a diagnostic medical report and any medical records in plaintiff's possession by this date.

September 30, 2016 Plaintiff shall serve medical expert reports by this date.

May 12, 2017 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

April 7, 2017 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.

May 12, 2017 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 7, 2017 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.
- May 12, 2017 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 31, 2017 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 9, 2017 @ 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.
- 10 business days prior to trial Pretrial Information Exchange Form due.
- June 26, 2017 **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