

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

**Docket No:** L-7305-15 (AS)

**Civil Action**

**CASE MANAGEMENT ORDER IV**

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 August 8, 2017:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Rachel Placitella	Plaintiff(s)
Caruso Smith	Lisa Massimi	CertainTeed; Union Carbide
Connell Foley	Scott Press	Superior Welding Supply Co.
Hardin Kundla	Nicea D'Annunzio	Calon Insulation
Kelley Jasons	Angela Caliendo	FMC Corp.
Margolis Edelstein	Jeanine D. Clark	Central Jersey Supply
Marks O'Neill	Sophia Tyriss	Bayonne Plumbing
Marshall Dennehey	Kevin Bright	Warren Pumps
McGivney Kluger	Kevin Hoffman	Binsky & Snyder; Mooney Bros.; Koenig
Pascarella DiVita	Gabriel Miller	Ingersoll Rand
Porzio Bromberg	Ahmed J. Kassim	AT&T Corp.
Speziali Greenwald	Joanne Hawkins	General Electric
Styliades Mezzanotte	Lisa R. Marshall	HM Royal Inc.
Swartz Campbell	William Morlok	Allied Glove
Tanenbaum Keale	Afigo Fadahunsi	CBS; Foster Wheeler
Tierney Law Office	Brian Garbacz	Elizabeth Industrial
Wilbraham Lawler	Matthew Jones	Green Tweed; Air & Liquid Systems Corp.

IT IS on this 9<sup>th</sup> day of **August, 2017**, *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

December 29, 2017 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 29, 2017 Depositions of corporate representatives shall be completed by this date.

## EARLY SETTLEMENT

February 2, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

## SUMMARY JUDGMENT MOTION PRACTICE

February 2, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

February 16, 2018 Summary judgment motions shall be filed no later than this date.

March 16, 2018 Last return date for summary judgment motions.

## MEDICAL DEFENSE

April 6, 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

February 9, 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.

April 6, 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.

## EXPERT DEPOSITIONS

April 27, 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

November 14, 2017 The settlement conference previously scheduled on this date is **cancelled**.

April 19, 2018 @ 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 11, 2018

Pretrial Information Exchange Form due.

May 21, 2018

**Trial-Ready** Date. (*The December 11, 2017 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