

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

**Docket No:** L-4261-19 (AS)

**Civil Action**

**CASE MANAGEMENT ORDER II**

JOHN SEWARD III and DEBRA CITRO, <i>Plaintiff(s),</i>
vs.
AMERICAN HONDA MOTOR CO., 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 February 20, 2020:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Rachel Placitella	Plaintiff(s)
Caruso Smith	Marcia DePolo	Union Carbide
Gibbons PC	Ethan Stein	Honeywell International
Greenbaum Rowe	Brian Kornbreck	American Honda Motor Co., Inc.
K&L Gates	Gary M. Sapir	Ford Motor Co.
Lynch Daskal	Diane Pompei	Nissan North America
Tanenbaum Keale	Christopher Keale	Morse Tec f/k/a Borg Warner
Wilbraham Lawler	Josette Spivak	PSEG

IT IS on this 24<sup>th</sup> day of **February 2020**, *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.

**DISCOVERY**

March 13, 2020 Defendants shall identify the cross-claims they intend to prove and the proofs as to each cross-claim per Rowe by this date.

**EARLY SETTLEMENT**

March 20, 2020 Settlement demands shall be served on all counsel and the Special Master by this date.

April 7, 2020 @ 10:00am Settlement conference. Counsel shall have authority to negotiate settlement or a client/carrier representative shall be available in person or by telephone.

**EXPERT DEPOSITIONS**

May 8, 2020                      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**

To be scheduled                      Final settlement conference  
June 15, 2020                      Trial Date.

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

*/s/ James F. Hyland*  
JAMES F. HYLAND, J.S.C.

cc:        Clerk, Mass Tort