

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

Docket No: L-6216-17 (AS)

Civil Action

CASE MANAGEMENT ORDER I

MALCOLM & BARBARA SHEINKER, <i>Plaintiff(s),</i>
vs.
3M COMPANY, 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 May 23, 2018:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Rachel Placitella	Plaintiff(s)
Caruso Smith	Marcia DePolo	Union Carbide
Kelley Jasons	Angela Caliendo	Square D
Margolis Edelstein	Dawn Dezii	Belden Wire & Cable
Marks O'Neill	Nicole M. Mulhern	Honeywell
McElroy Deutsch	Joseph D. Rasnek Brian Sorenson	Allen Bradley Eaton
Pascarella DiVita	Bradley F. Bishop	General Cable
Tanenbaum Keale	Robert M. Gilmartin, Jr.	CBS Corp.; General Electric
Wilbraham Lawler	Lynn E. Roberts, III	Siemens

IT IS on this 4th day of June, 2018, *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

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|---------------|--|
| June 1, 2018 | Defendants shall serve answers to standard interrogatories by this date. |
| June 15, 2018 | Plaintiff shall propound supplemental interrogatories and document requests by this date. |
| July 20, 2018 | Defendants shall serve answers to supplemental interrogatories and document requests by this date. |
| June 15, 2018 | Defendants shall propound supplemental interrogatories and document requests by this date. |

July 20, 2018 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

August 10, 2018 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.

August 10, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

October 5, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

August 17, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

August 31, 2018 Summary judgment motions shall be filed no later than this date.

September 28, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

August 17, 2018 Plaintiff shall serve medical expert reports by this date.

October 12, 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

August 17, 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.

October 12, 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

November 2, 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

October 23, 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.

November 19, 2018

Pretrial Information Exchange submissions due.

November 26, 2018

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