

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

Docket No: L-6216-17 (AS)

Civil Action

CASE MANAGEMENT ORDER II

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 September 13, 2018:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Rachel Placitella	Plaintiff(s)
Caruso Smith	Alexandra Caruso	Union Carbide
Kelley Jasons	Angela Caliendo	Square D
Lavin O'Neil	Julianne Jayson	International Business Machines Corp.
Margolis Edelstein	Jeanine D. Clark	Belden Wire & Cable; Alpha Wire
Marshall Dennehey	Paul Johnson	Honeywell, Inc.
McElroy Deutsch	Denise Harris	Allen Bradley; Eaton
Pascarella DiVita	John S. McGowan	General Cable
Rawle & Henderson	David Samlin	Honeywell International Inc.
Speziali Greenwald	Joann Hawkins	General Electric
Tanenbaum Keale	James Keale	CBS Corp.
Wilbraham Lawler	Lynn E. Roberts, III	Siemens

IT IS on this 17th day of **September, 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.

DISCOVERY

- September 28, 2018 Defendants shall serve answers to standard interrogatories by this date.
- October 12, 2018 Defendants shall serve answers to supplemental interrogatories and document requests by this date.
- October 12, 2018 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

November 16, 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.

December 14, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

March 15, 2019 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

January 18, 2019 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

February 1, 2019 Summary judgment motions shall be filed no later than this date.

March 1, 2019 Last return date for summary judgment motions.

MEDICAL DEFENSE

January 14, 2019 Plaintiff shall serve medical expert reports by this date.

April 1, 2019 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

January 14, 2019 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 1, 2019 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 30, 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

October 23, 2018 The settlement conference previously scheduled on this date is **cancelled**.

April 11, 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. 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 20, 2019

Pretrial Information Exchange submissions due.

May 28, 2019 (*Tuesday*)

Trial-Ready Date. (*The November 26, 2018 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