

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

**Docket No:** L-2134-18 (AS)

**Civil Action**

**CASE MANAGEMENT ORDER III**

ESTATE of RONALD SNYDER, <i>Plaintiff(s),</i>
vs.
BASF 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 July 24, 2019:

FIRM	ATTORNEY	CLIENT
Belluck & Fox	James Long	Plaintiff(s)
Breuninger & Fellman	Susan B. Fellman	Genuine Parts Co.; National Automotive Parts Assoc.
DLA Piper	Stephen H. Barrett	BASF Catalysts; BASF Corp.
Duane Morris	Dawnn Briddell	Raymond Corp.
Gibbons PC	Robert Brown	Honeywell International
Goldberg Segalla	Elizabeth Weill	Navistar, Inc.
Goodell Devries	Malcolm S. Brisker	Crown Equipment
Harwood Lloyd	Victoria Silva	Carlisle Industrial Brake & Friction
Landman Corsi	Gregory Damico	Whittaker Clark & Daniels
Lavin Cedrone	Leland Kellner	Daimler Trucks North America
McElroy Deutsch	Joseph D. Rasnek	Eaton Corp.; Rockwell Automation; Pfizer
McGivney Kluger	Marvin Blakely	HM Royal, Inc.
O'Toole Scrivo	Gary Van Lieu	RT Vanderbilt Co.
Rawle & Henderson	Joshua Lichtenstein	Mack Trucks Inc.; Cyprus Amax Minerals;
Reilly McDevitt	James M. Andris, Jr.	Southern Talc Co.
Wilbraham Lawler	Josette Spivak	Great Dane; Kelsey-Hayes

IT IS on this 24<sup>th</sup> day of July 2019, 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**

September 30, 2019 Depositions of corporate representatives shall be completed by this date.

## **EARLY SETTLEMENT**

September 30, 2019 Settlement demands shall be served on all counsel and the Special Master by this date.

## **MEDICAL EXPERT REPORT**

December 16, 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**

October 31, 2019 Plaintiff shall identify its liability experts and serve liability expert reports by this date or waive any opportunity to rely on liability expert testimony.

December 16, 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.

## **SUMMARY JUDGMENT MOTION PRACTICE**

December 20, 2019 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

January 17, 2020 Summary judgment motions shall be filed no later than this date.

February 14, 2020 Last return date for summary judgment motions.

## **ECONOMIST EXPERT REPORTS**

December 16, 2019 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**

March 6, 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**

October 31, 2019 The settlement conference previously scheduled on this date is **cancelled**.

To be scheduled Settlement conference.

March 23, 2020

Trial Date. *(The December 2, 2019 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