

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

Docket No: L-5016-15 (AS)

Civil Action

CASE MANAGEMENT ORDER II

JESSE & CAROL SOLORZANO, <i>Plaintiff(s),</i>
vs.
AMTICO INTERNATIONAL INC., 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 March 29, 2016:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Dennis Geier	Plaintiff(s)
Caruso Smith	Alexandra Caruso	Union Carbide
Dickie McCamey	William Smith	Newark Welding & Fabrications
Goldfein & Joseph	Madhurika Jeremiah	Domco
Hill Wallack	Augusta O'Neill	Home DePot
Lavin O'Neil	Catherine Brunermer	3M Co.
Lynch Daskal	Alexandra Ober	Georgia Pacific
Margolis Edelstein	Dawn Dezii	J&M Flooring
Marshall Dennehey	Paul Johnson	Kaiser Gypsum
McElroy Deutsch	John (Jack) McGuire	Custom Building Products
Rawle & Henderson	Meredith Mack	American Biltrite Inc.
Segal McCambridge	Michael F. Gorman	Mannington Mills

IT IS on this 4th day of **April, 2016**, *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

- | | |
|----------------|--|
| April 15, 2016 | Defendants shall serve answers to standard interrogatories by this date. |
| April 15, 2016 | Plaintiff shall propound supplemental interrogatories and document requests by this date. |
| May 13, 2016 | Defendants shall serve answers to supplemental interrogatories and document requests by this date. |
| April 15, 2016 | Defendants shall propound supplemental interrogatories and document requests by this date. |
| May 13, 2016 | Plaintiff shall serve answers to supplemental interrogatories and document requests by this date. |

July 29, 2016 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 31, 2016 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

September 9, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

September 16, 2016 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

September 30, 2016 Summary judgment motions shall be filed no later than this date.

October 28, 2016 Last return date for summary judgment motions.

MEDICAL DEFENSE

May 31, 2016 Plaintiff shall serve medical expert reports by this date.

September 16, 2016 The defense medical examination of plaintiff(s) shall be completed by this date.

November 30, 2016 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

September 30, 2016 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.

November 30, 2016 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.

ECONOMIST EXPERT REPORTS

September 30, 2016 Plaintiff 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.

November 30, 2016 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

December 30, 2016 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

September 7, 2016 The settlement conference previously scheduled on this date is **cancelled**.

January 11, 2017 @ 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.

January 30, 2017 Trial Date. (*The October 11, 2016 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