

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

Docket No: L-7835-12 (AS)

Civil Action

CASE MANAGEMENT ORDER II

ARTHUR & GLORIA STAUCH,
<i>Plaintiff(s),</i>
vs.
ABB 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 September 13, 2013:

FIRM	ATTORNEY	CLIENT
Lanier Law Firm	Jessica Woodhouse	Plaintiff(s) co-counsel <i>Cohen Placitella & Roth (Plaintiff's counsel)</i>
Gold Albanese Barletti	Chris Bruun	Wakefern
Hawkins Parnell	Edward P. Abbot	Oakfabco
Hoagland Longo	Matthew Cassidy	Abe Gruber Supply
Landman Corsi	Elissa Denniston	Sequoia Ventures Inc.
McElroy Deutsch	Helen Antoniou McGowan	Allen Bradley; Eaton; Exxon
McGivney Kluger	Caitlin Christie Joel Clark	Triangle; Cooper Electric; Killark; Rogers Corp.; Linden Electric; Hubbell Inc.
Speziali Greenwald	Michael Quinn	General Electric; CBS; Foster Wheeler

IT IS on this 16th day of **September, 2013** 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

October 18, 2013 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.

November 1, 2013 Depositions of corporate representatives shall be completed by this date.

LIABILITY EXPERT REPORTS

November 15, 2013 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.

December 16, 2013 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

November 15, 2013 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.

December 16, 2013 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 31, 2013 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

December 10, 2013 @ 1:30pm 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 13, 2014 Trial Date. (*The October 28, 2013 trial is adjourned to this date.*)

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

/s/ Vincent Le Blon
VINCENT Le BLON, J.S.C.

Brody Deposition Services
Priority One