

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

Docket No: L-4955-14 (AS)

Civil Action

CASE MANAGEMENT ORDER II

FREDERICK & ROCHELL UMSCHWEIS, <i>Plaintiff(s),</i> vs. AIR & LIQUID SYSTEMS, et al <i>Defendant(s).</i>
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This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on February 26, 2015:

FIRM	ATTORNEY	CLIENT
Weitz & Luxenberg	Alex Eiden	Plaintiff(s)
Caruso Smith	Joyce Min	CertainTeed; Union Carbide
Hoagland Longo	Steven Satz	Goulds Pumps
Kelley Jasons	Joseph Vassalotti	FMC
Marshall Dennehey	Doug Suplee	BMCE, Inc.
McElroy Deutsch	Nancy McDonald	Pfizer; Flowserve; Rockwell
McGivney Kluger	Caitlin Christie	Atwood & Morrill
Pascarella DiVita	Brad Bishop	Crane Co.
Reilly Janiczek	Edward Kang	ITT Corp.
Segal McCambridge	Joseph James Gianetti	BW/IP
Wilbrham Lawler	Andrew Greco	Buffalo Pumps

IT IS on this 27th day of **February, 2015** 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

March 31, 2015 Plaintiff shall serve answers to wrongful death interrogatories by this date.

April 30, 2015 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.

April 30, 2015 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

May 8, 2015 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

July 10, 2015 Summary judgment motions shall be filed no later than this date.

August 7, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

June 30, 2015 Plaintiff shall serve medical expert reports, including wrongful death report, by this date.

June 30, 2015 Plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

September 30, 2015 Defendants shall identify its medical experts and serve medical expert 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

June 30, 2015 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.

September 30, 2015 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

June 30, 2015 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.

September 30, 2015 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

October 16, 2015 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.

