

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

**Docket No: L-1933-12 (AS)**

**Civil Action**

**CASE MANAGEMENT ORDER VI**

RACHELE & DAVID VENTRES,  <i>Plaintiff(s),</i>  vs.  002 AUTO PARTS, INC., 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 September 16, 2014:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph J. Mandia	Plaintiff(s)
Caruso Smith	Marcia DePolo	Union Carbide
Gibbons	Ethan Stein	Honeywell
Landman Corsi	Joseph Tomaino	Fel Pro
Littleton Joyce	Christina M. Delaney	BASF
Kirkland & Ellis	Daniel A. ress	BASF (National Counsel)

IT IS on this 17<sup>th</sup> day of **September, 2014** *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*.

**MISCELLANEOUS**

Plaintiff's counsel shall provide a date for Mr. Fitzgerald's deposition no later than September 26, 2014.

Defendant BASF may serve supplemental liability expert reports by experts previously disclosed, if any, within twenty days of Mr. Fitzgerald's deposition.

**EXPERT DEPOSITIONS**

December 31, 2014      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**

January 21, 2015	<i>In limine</i> motions shall be filed by this date.
February 6, 2015	Return date for <i>in limine</i> motions.
March 2, 2015	Trial Date. <i>Pretrial Information Exchange shall be due ten (10) days prior to the scheduled trial date.</i>

**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  
Brody Deposition Services  
Priority One