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

Docket No: L-1429-18 (AS)

PAMELA & ROGER WOLFE

vs.

Plaintiff(s),

Civil Action

CASE MANAGEMENT ORDER I

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and

the following parties on June 14, 2018:

FIRM	ATTORNEY	CLIENT
Simon Greenstone	Joseph Mandia	Plaintiff(s) co-counsel with Szaferman Lakind
Drinker Biddle	Kevin DeMaio	Johnson & Johnson; Johnson & Johnson Consumer
Hoagland Longo	Daniel Kuszmerski	Whittaker Clark & Daniels
O'Toole Scrivo	Gary Van Lieu	Colgate Palmolive
Rawle & Henderson	Paul Smyth	Cyprus Amax Minerals; Imerys Talc America

IT IS on this <u>15th</u> day of <u>June, 2018</u>, *effective from the conference date;*

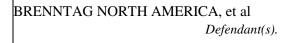
ORDERED as follows:

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.

Defense counsel shall notify plaintiff's counsel within thirty (30) days of the date of this Order if their client was incorrectly named in the Complaint. Counsel may be barred from raising this defense at a later time for failure to comply.

DISCOVERY

June 29, 2018	Defendants shall serve answers to standard interrogatories by this date.
July 13, 2018	Plaintiff shall propound supplemental interrogatories and document requests by this date.
August 17, 2018	Defendants shall serve answers to supplemental interrogatories and document requests by this date.
July 13, 2018	Defendants shall propound supplemental interrogatories and document requests by this date.
August 17, 2018	Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
October 5, 2018	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.



October 5, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

January 4, 2019 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- November 9, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.
- November 23, 2018 Summary judgment motions shall be filed no later than this date.
- December 21, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

- November 5, 2018 Plaintiff shall serve medical expert reports by this date.
- November 5, 2018 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.
- January 31, 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

November 5, 2018 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.

January 31, 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.

ECONOMIST EXPERT REPORTS

- November 5, 2018 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.
- January 31, 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

February 28, 2019 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

February 21, 2019 @ 9:30am	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.
March 18, 2019	Pretrial Information Exchange submissions due.
March 25, 2019	Trial-Ready Date.

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

/s/ Ana C. Víscomí ANA C. VISCOMI, J.S.C.

cc: Clerk, Mass Tort