

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

ROBERT & EILEEN ZAWACKI, <i>Plaintiff(s),</i> vs. AUGUST ARACE & SONS, et al <i>Defendant(s).</i>

Docket No: L-4564-14 (AS)

Civil Action

CASE MANAGEMENT ORDER IV

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on *December 22, 2015*:

FIRM	ATTORNEY	CLIENT
Wilentz Goldman & Spitzer	Philip Tortoreti	Plaintiff(s)
Bucca & Campisano	Benjamin Bucca	IMO
Connell Foley	Scott Press	August Arace; The Frank A. McBride Co.
Hack Piro	Robert Alencewicz	Johansen
Hardin Kundla	Nicea D'Annunzio	Calon Insulation
Hawkins Parnell	Roy Viola	Milwaukee Valve
Hoagland Longo	Jason R. Gosnell	Goulds Pumps; Industrial Welding
Kent McBride	Ravi Shah	Binsky; TJ McGlone; Mooney
Landman Corsi	Jorkeell Echeverria	Sequoia Ventures, Inc.
Margolis Edelstein	Dawn Dezii	Woolsulate; Central Jersey Supply; URS Energy & Construction
Marks O'Neill	Paul Smyth	Nicholas Schwalje Inc.
McGivney Kluger	Joel Clark	Raritan Supply; Bergen Ind.; Madsen & Howell
McGivney Kluger	Thomas McNulty	Fairbanks; Flowserve
Pascarella DiVita	Charles P. Savoth, III	Crane Co.; Ingersoll Rand
Reilly Janiczek	Michelle Cappuccio	Cleaver Brooks; Miller & Chitty
Tierney Law Office	Kevin Buttery	Elizabeth Industrial Supply

IT IS on this 22nd day of **December, 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

January 15, 2016 Defendants shall serve answers to supplemental interrogatories and document requests by this date.

January 15, 2016 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

February 16, 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.

February 16, 2016 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

February 29, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

March 18, 2016 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

April 1, 2016 Summary judgment motions shall be filed no later than this date.

April 29, 2016 Last return date for summary judgment motions.

MEDICAL DEFENSE

February 22, 2016 Upon request, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

July 1, 2016 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

May 31, 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.

July 1, 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

May 31, 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.

July 1, 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

July 22, 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

