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

MONIQUE HUG and JEAN PHILIPP HUG, *Plaintiff(s),* vs. BRENNTAG SPECIALTIES INC., et al *Defendant(s).*

Docket No: **L-4862-15 (AS)**

Civil Action

CASE MANAGEMENT ORDER II

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on *April 7, 2016:*

FIRM	ATTORNEY	CLIENT
Simon Greenstone	Leah Kagan	Plaintiff(s) *(co-counsel with Szaferman Lakind)*
Haworth Coleman	Dominique Romano	Loreal USA Inc.
Hoagland Longo	Marc S. Gaffrey	Whittaker Clark & Daniels; Cyprus; Unilever
McElroy Deutsch	Donna Gardiner	Pfizer; Coty
O'Toole Fernandez	Gary Van Lieu Joshua Lichtenstein	Colgate-Palmolive
Rivkin Radler	Alex Pappas	Helen of Troy

IT IS on this **7th** day of **April, 2016**, *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

April 29, 2016 — Mennen shall produce its second Production of Documents by this date.

June 30, 2016 — Mennen shall produce its third Production of Documents by this date.

June 30, 2016 — Mennen shall respond to plaintiff's deficiency letter by this date.

April 29, 2016 — Unilever shall serve answers to standard interrogatories by this date.

April 29, 2016 — Unilever shall serve answers to supplemental interrogatories and document requests by this date.

April 29, 2016 — Unilever shall provide a date for a deposition of its corporate representative by this date.

VACATED

June 30, 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.

July 29, 2016 — Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

July 15, 2016 — Settlement demands shall be served on all counsel and the Special Master by this date.

MEDICAL DEFENSE

June 30, 2016 — Plaintiff shall serve wrongful death report, if any, by this date.

August 31, 2016 — 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

August 31, 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.

EXPERT DEPOSITIONS

September 30, 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 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

April 29, 2016 — The settlement conference previously scheduled on this date is **cancelled**.

September 7, 2016 @ 10:00am — 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.

October 31, 2016 — Trial Date. *(The June 27, 2016 trial is adjourned to this date.)*

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

VACATED