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

DANIEL & MARGARET HUGHES,
Plaintiff(s),

vs.

3M COMPANY, et al
Defendant(s).

Docket No: L-2720-16 (AS)

Civil Action

CASE MANAGEMENT ORDER I

This matter coming in for a Case Management Conference before the Honorable Ana C. Viscomi and the following parties on *August 19, 2016*:

FIRM	ATTORNEY	CLIENT
Locks Law Firm	Alfred Anthony	Plaintiff(s)
Caruso Smith	Marcia DePolo	CertainTeed; Union Carbide
Eckert Seamans	Stephanie Coleman	AO Smith
Gibbons PC	Ahmed Kassim	Honeywell International
Lavin O'Neil	Donna Candelora	3M Company
Lewis Brisbois	Jesse D. Rodgers	Henkel Corp.
Littleton Joyce	Jason Schmitz	BASF
Maron Marvel	Lina Carreras	Baltimore Ennis Land Co., Inc.
Marshall Dennehey	Jeremy Zacharias	Pep Boys
McGivney Kluger	Joel Clark Caitlin Christie	Bell Supply, DAP, Triangle, Weil McLain
Methfessel & Werbel	Jacqueline Falcone	Toots Lee Automotive
Rawle & Henderson	Jamie L. Augustinsky	Hajoca; Billows Electrical Supply
Segal McCambridge	Kevin Turbert	Southwire Co.
Speziali Greenwald	Joanne Hawkins	UHR Electrical Supply
Wilbraham Lawler	Anisha S. Abraham	R.H. Peterson; Broudy Supply; Siemens Industry, Inc.

IT IS on this **22nd** day of **August, 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.

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

Plaintiff's counsel to ascertain whether plaintiff's nephew will appear at deposition without necessity of subpoena and advise defense counsel.

Plaintiff to obtain social security records and serve upon receipt.

September 2, 2016	Defendants DAP, Triangle, Henkel Corp., Fireplace People, and Broudy Precision shall file answer or adoption of standard answer to the complaint by this date.
September 7, 2016	Plaintiff shall propound specific interrogatories as to defendants Fireplace People and R.H. Peterson by this date.
October 21, 2016	Defendants Fireplace People and R.H. Peterson shall serve answers to interrogatories by this date.
September 19, 2016	Plaintiff shall serve amended answers to standard interrogatories by this date.
October 7, 2016	Defendants shall serve answers to standard interrogatories by this date. Defendants must also serve answers to B and C interrogatories by this date if plaintiff demanded same.
September 7, 2016	Plaintiff shall propound supplemental interrogatories and document requests by this date. Plaintiff shall also advise specific defendants demand to answer B and C interrogatories.
October 7, 2016	Defendants shall serve answers to supplemental interrogatories and document requests by this date.
September 7, 2016	Defendants shall propound supplemental interrogatories and document requests by this date.
October 7, 2016	Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
January 6, 2017	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.
November 4, 2016	Depositions of corporate representatives shall be completed by this date. Counsel shall comply with Order of June 18, 2014 regarding scheduling of corporate representative depositions.
October 28, 2016	Any and all documents responsive to Notices to Produce shall be produced at least one week prior to a corporate representative's deposition, if not produced in accordance with deadlines set forth for responses to document requests.

CASE MANAGEMENT CONFERENCE

November 9, 2016 @ 1:30pm	Case Management Conference is scheduled before the Special Master. Defense counsel shall be prepared to discuss any and all defendants seeking to serve medical expert reports, transfer of pathology and meeting deadlines set forth in this Order or requesting extensions.

EARLY SETTLEMENT

December 16, 2016	Settlement demands shall be served on all counsel and the Special Master by this date.
January 27, 2017 @ 1:30pm	Early 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.

SUMMARY JUDGMENT MOTION PRACTICE

January 20, 2017	Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.
March 3, 2017	Summary judgment motions shall be filed no later than this date.
March 31, 2017	Last return date for summary judgment motions.

MEDICAL DEFENSE

October 19, 2016	Plaintiff shall serve medical expert reports by this date. Plaintiff shall forward pathology to lead medical defense counsel or designated expert by this date.
December 14, 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

December 5, 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.
February 6, 2017	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

Expert depositions shall be completed as agreed upon by counsel. Counsel shall cooperate in scheduling depositions and shall contact court, if necessary. 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

To be scheduled	Settlement conference.
10 business days prior to trial	Pretrial Information Exchange Form due.
April 24, 2017	**Trial-Ready** Date.

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

ANA C. VISCOMI, J.S.C.

cc: Clerk, Mass Tort