

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

CHARLOTTE FRIEDMAN, vs. 84 LUMBER CO., et al	<i>Plaintiff(s),</i> <i>Defendant(s).</i>
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Docket No: **L-2335-16 (AS)**

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 September 1, 2016:

FIRM	ATTORNEY	CLIENT
Maune Raichle	Nathaniel Falda	Plaintiff(s)
Bonner Kiernan	Sheila King	Occidental
Caruso Smith Picini	Alexandra Caruso	Union Carbide
Dickie McCamey	William Smith	84 Lumber
Gibbons PC	Mark R. Galdieri	Honeywell International Inc.
Hoagland Longo	Jillian Madison	Finmeccanica NA, Inc.
Kelley Jasons	Angela Caliendo	Square D
Lavin O'Neil	Edward Finch	GTE Products of Connecticut Corp.
LeClair Ryan	John A. Soltesz III	Ford Motor Co.
Lynch Daskal	Troy P. Cunningham	Georgia Pacific
Margolis Edelstein	Justin M. Bettis	Belden
Marshall Dennehey	Paul Johnson	Pep Boys; Kaiser Gypsum
McElroy Deutsch	Robert M. Gilmartin	Eaton Corp.; Rockwell Automation
McGivney Kluger	Joel Clark	Rogers Corp.; Tyco Electronics; Zenith Radio
O'Brien Firm	Tracy Cabbage	BBC
Porzio Bromberg	Diane Averell	Cytec Industries
Reilly Janiczek	Michelle Cappuccio	Gould Electronics
Speziali Greenwald	Joanne Hawkins	General Electric / CBS
Wilbraham Lawler	Michelle Kirsch	Siemens Industry, Inc.; Plastics Engineering Co.

IT IS on this 6th day of **September, 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

- September 16, 2016 Defendants shall serve answers to standard interrogatories by this date.
- September 30, 2016 Plaintiff shall propound supplemental interrogatories and document requests by this date.
- October 31, 2016 Defendants shall serve answers to supplemental interrogatories and document requests by this date.
- September 30, 2016 Defendants shall propound supplemental interrogatories and document requests by this date.
- October 31, 2016 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- December 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.
- January 31, 2017 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

- March 24, 2017 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- February 3, 2017 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.
- February 17, 2017 Summary judgment motions shall be filed no later than this date.
- March 17, 2017 Last return date for summary judgment motions.

MEDICAL DEFENSE

- September 30, 2016 Plaintiff shall serve executed medical authorizations by this date.
- November 30, 2016 Plaintiff shall serve medical expert reports by this date.
- November 30, 2016 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.
- April 14, 2017 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

- February 28, 2017 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.

April 14, 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.

ECONOMIST EXPERT REPORTS

February 28, 2017 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.

April 14, 2017 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

May 5, 2017 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 27, 2017 @ 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.

10 business days prior to trial Pretrial Information Exchange Form due.

May 30, 2017 (*Tues.*) **Trial-Ready** 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