

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

LOUIS & ANN PAIGE,
<i>Plaintiff(s),</i>
vs.
AO SMITH WATER PRODUCTS, et al
<i>Defendant(s).</i>

Docket No: **L-829-14 (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 July 24, 2014:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Michael McMahon	Plaintiff(s)
Bucca & Campisano	Christine Bucca	IMO
Carroll McNulty	Michael A. Moroney	Copes Vulcan
Caruso Smith	Marcia DePolo	Union Carbide; CertainTeed
Eckert Seaman		Superior Lindgerwood Mundy Corp.
Forman Perry	Timothy Coughlan	Velan Valve Corp.
Gibbons PC	Mark Galdieri	Honeywell
Hoagland Longo	Steven Satz	York; Burnham; Goulds Pumps; Borg Warner
Kelley Jasons	Angela Caliendo	FMC; Crosby Valve; Square D
Kent McBride	Ravi Shah	Alfa Laval
Margolis Edelstein	J. Edmund Bryak	John Crane; Goodrich
Marshall Dennehey	Lisa Only	Riley Stoker; Warren Pumps
Mayfield Turner	Andrew Keith	Carrier Corp.
McElroy Deutsch	Joseph D. Rasnek	AO Smith Water Products; Flowserve US Inc, as successor to Rockwell
McGivney Kluger	Joel Clark Caitlin Christie	Falk; Hopeman Brothers; Weil-McLain; Fairbanks; Nash; Zurn; Taco; Atwood & Morrill
O'Toole Fernandez	Gina Apostolico	Clark Reliance
Pascarella DiVita	Stephanie DiVita	Trane US Inc.
Reilly Janiczek	Michelle Cappuccio	Cleaver Brooks
Segal McCambridge	Nicole Markowitz	BW/IP
Vasios Kelly Strollo	Thomas J. Kelly, Jr.	Bird, Inc.; Armstrong International Inc.
Wilbraham Lawler	John A. Fitzpatrick	Greene Tweed

IT IS on this 25th day of July, 2014 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

September 30, 2014 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 31, 2014 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

October 21, 2014 The settlement conference previously scheduled on this date is **CANCELLED**.

November 7, 2014 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

November 21, 2014 Summary judgment motions shall be filed no later than this date.

December 19, 2014 Last return date for summary judgment motions.

MEDICAL DEFENSE

January 23, 2015 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

November 17, 2014 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 23, 2015 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

February 20, 2015 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 17, 2015 @ 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.

March 16, 2015

Trial Date. (*The November 10, 2014 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
Brody Deposition Services
Priority One