

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

AUDREY SAMPSON,  vs. 3M COMPANY, et al	<i>Plaintiff(s),</i>  <i>Defendant(s).</i>
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Docket No: **L-5384-11 (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 January 10, 2017:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Christopher Placitealla	Plaintiff(s)
Caruso Smith	Marcia DePolo	CetaInTeed; Union Carbide
Gibbons PC	Robert Brown	The Sherwin Williams Co.
Hoagland Longo	Daniel Kuzmerski	Whittaker Clark & Daniels
Littleton Joyce / Kirkland & Ellis	Jason Schmitz Peter Farrell	BASF
Lynch Daskal	Elissa Regev	Georgia Pacific
McElroy Deutsch	Kathleen Chetta	Benjamin Moore
O'Toole Fernandez	Gary Van Lieu	Dana RT Vanderbilt Co.
Porzio Bromberg	Michelle Burke	DuPont
Reilly Janiczek	Gino Mecoli	Southern Talc Co.

IT IS on this 11<sup>th</sup> day of **January, 2017**, *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**

February 28, 2017      Plaintiff shall serve answers to standard interrogatories.

February 28, 2017      Plaintiff shall serve answers to wrongful death interrogatories by this date.

March 31, 2017      Plaintiff shall propound supplemental interrogatories and document requests by this date.

May 5, 2017      Defendants shall serve answers to supplemental interrogatories and document requests by this date.

March 31, 2017 Defendants shall propound supplemental interrogatories and document requests by this date.

May 5, 2017 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

June 30, 2017 Depositions of corporate representatives shall be completed by this date.

August 31, 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.

**EARLY SETTLEMENT**

September 8, 2017 Settlement demands shall be served on all counsel and the Special Master by this date.

**ECONOMIST EXPERT REPORTS**

October 31, 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.

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

*By Ana C. Viscomi*  
ANA C. VISCOMI, J.S.C.

cc: counsel:

Goldfein & Joseph for ACL; Bell

cc: Clerk, Mass Tort