

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

Docket No: **L-1975-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER III

| | |
|---|--|
| DAWN AUBE (Estate of Joseph Claffy), vs. 3M COMPANY, et al | <i>Plaintiff(s),</i> <i>Defendant(s).</i> |
|---|--|

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on November 20, 2014:

| FIRM | ATTORNEY | CLIENT |
|-------------------------|--------------------|----------------------------------|
| Cohen Placitella & Roth | Rachel Placitella | Plaintiff(s) |
| Caruso Smith | Lisa Massimi | HB Fuller; Union Carbide |
| Goldfein & Joseph | Madhurika Jeremiah | ACL; Atlas |
| Hack Piro | Robert Alencewicz | Johansen |
| Kent McBride | David Rutkowski | Mooney |
| Margolis Edelstein | Dawn Dezii | John Carne, Inc.; Central Jersey |
| Tierney Law Office | Mark Turner | Elizabeth Industrial Supply |

IT IS on this 21st day of November, 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

March 16, 2015 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.

March 16, 2015 Depositions of corporate representatives shall be completed by this date.

SUMMARY JUDGMENT MOTION PRACTICE

April 10, 2015 Summary judgment motions shall be filed no later than this date.

May 8, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

June 5, 2015 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

EXPERT DEPOSITIONS

June 19, 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

June 11, 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.

June 29, 2015 Trial Date. (*The December 1, 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