

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

NANCY CAIRO,  <i>Plaintiff(s),</i>  vs.  AMERICAN INTERNATIONAL IND., et al  <i>Defendant(s).</i>
---

Docket No: **L-900-14 (AS)**

Civil Action

CASE MANAGEMENT ORDER V

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on September 17, 2015:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph J. Mandia	Plaintiff(s)
Caruso Smith	Alexandra Caruso	Union Carbide; CertainTeed
Fornaro Francioso	Richard Fornaro	Yardville Supply
Gordon & Silber	Russell Porter	American International
Lynch Daskal		Georgia Pacific
Marshall Dennehey	Paul Johnson	Kaiser Gypsum
Montgomery McCracken	Ronald Hurst	

IT IS on this 21<sup>st</sup> day of September, 2015 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**

October 19, 2015      Yardville Supply shall serve answers to supplemental interrogatories by this date.

November 30, 2015      Depositions of corporate representative depositions shall be completed by this date.

**EARLY SETTLEMENT**

January 29, 2016      Settlement demands shall be served on all counsel and the Special Master by this date.

**SUMMARY JUDGMENT MOTION PRACTICE**

December 24, 2015      Summary judgment motions shall be filed no later than this date by those defendants permitted by the court to re-file their motions.

January 22, 2016      Last return date for summary judgment motions.

## **LIABILITY EXPERT REPORTS**

October 19, 2015      Plaintiff shall serve supplemental expert reports, if any, by this date.

February 29, 2016      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**

March 21, 2016      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**

October 8, 2015      The settlement conference previously scheduled on this date is **cancelled**.

March 16, 2016 @ 1:30pm      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.

April 18, 2016      Trial Date. (*The November 9, 2015 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