

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

Docket No: L-900-14 (AS)

Civil Action

CASE MANAGEMENT ORDER XIV

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

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on January 14, 2020:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s)
Caruso Smith	Marcia DePolo	Union Carbide
Fornaro Francioso	Ricia Fornaro	Yardville Supply
Hawkins Parnell	Manuel A. Guevara	American International Ind.
Marshall Dennehey	Paul Johnson	Kaiser Gypsum
McGivney Kluger	Caitlin Bodtmann	Whittaker Clark & Daniels
Rawle & Henderson	Sebastian Goldstein	Cyprus Mines Co.; Cyprus Amax Minerals Corp.

IT IS on this **14th** day of **January 2020**, *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.

Any jurisdictional motions must be filed in accordance with the Court Rules or be waived.

Any *forum non conveniens* motions must be filed as soon as practicable; once sufficient discovery is conducted so that the motion may be properly brought.

OTHER MOTIONS

February 14, 2020 Last return date for any motions for leave to file a third-party complaint.

EARLY SETTLEMENT

February 14, 2020 Settlement demands shall be served on all counsel and the Special Master by this date.

EXPERT DEPOSITIONS

June 30, 2020 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

To be scheduled Settlement conference.

July 27, 2020 Trial 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