

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

Docket No: **L-836-10 (AS)**

Civil Action

CASE MANAGEMENT ORDER VI

ESTATE OF ANITA CREUTZBERGER,  <i>Plaintiff(s),</i>  vs.  ABEX CORPORATION, et al  <i>Defendant(s).</i>
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This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on January 9, 2014:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Christopher Placitella	Plaintiff(s)
Gibbons	Ethan Stein	Honeywell
Harwood Lloyd	John S. Guerin	Motion Control
Hawkins Parnell	Roy Viola	Pneumo Abex
LeClair Ryan	Robyn Kalocsay	Ford
O'Toole Fernandez	Jacqueline Multick	Dana Companies
Wilbraham Lawler	Andrea Greco	Kelsey-Hayes / Maremont

IT IS on this 10<sup>th</sup> day of January, 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 31, 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.

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

**EARLY SETTLEMENT**

January 29, 2014 The settlement conference previously scheduled on this date is **cancelled**.

April 11, 2014 Settlement demands shall be served on all counsel and the Special Master by this date.

## **SUMMARY JUDGMENT MOTION PRACTICE**

- April 25, 2014            Summary judgment motions limited to product identification issues shall be filed no later than this date.
- May 23, 2014            Last return date for product identification summary judgment motions.

## **MEDICAL DEFENSE**

- March 31, 2014           Plaintiff shall serve additional medical expert reports by this date.
- May 30, 2014            Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

## **LIABILITY EXPERT REPORTS**

- June 30, 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.
- July 31, 2014            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**

- August 15, 2014           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**

- July 17, 2014 @ 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.
- August 25, 2014            Trial Date. *(The March 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/ Vincent Le Blon*  
VINCENT Le BLON, J.S.C.

cc:        Clerk, Mass Tort  
          Brody Deposition Services  
          Priority One