

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

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

Civil Action

CASE MANAGEMENT ORDER IX

ESTATE OF ANITA CREUTZBERGER, <i>Plaintiff(s),</i> vs. ABEX CORPORATION, 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 April 1, 2015:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Christopher Placitella Rachel Placitella	Plaintiff(s)
Gibbons	Ethan Stein	Honeywell
LeClair Ryan	Robyn Kalocsay	Ford

IT IS on this 6th day of **April, 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*.

EARLY SETTLEMENT

April 17, 2015 Settlement demands shall be served on Honeywell and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

May 1, 2015 Summary judgment motions shall be filed no later than this date.

May 29, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

June 15, 2015 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date. **In addition, defendants shall notify plaintiff's counsel (as well as all counsel of record) of a joinder in an expert medical defense by this date.**

July 15, 2015 Plaintiff shall serve a rebuttal expert medical report, if any, by this date.

LIABILITY EXPERT REPORTS

- June 15, 2015 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.
- July 15, 2015 Plaintiff shall identify its rebuttal liability experts and serve rebuttal liability expert reports, if any, by this date.

EXPERT DEPOSITIONS

- July 31, 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

- 10 business days prior to trial Pretrial Information Exchange Form.
- September 14, 2015 Trial-Ready Date. (*The May 4, 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
 Brody Deposition Services
 Priority One