

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

Docket No: L-4014-13 (AS)

Civil Action

CASE MANAGEMENT ORDER V

JAMES & GEORGIA CROWLEY, <i>Plaintiff(s),</i>
vs.
AW CHESTERTON CO., 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 May 23, 2018:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Rachel Placitella	Plaintiff(s)
Eckert Seamans	Christopher Bladel	JCP&L
Garrity Graham	Anthony Marino	United Conveyor
Hardin Kundla	Cynthia Lee	Calon Insulation
Margolis Edelstein	Dawn Dezii	Woolsulate; United Energy & Construction
Marshall Dennehey	Jessica Wachstein	Riley Power
McElroy Deutsch	Joseph D. Rasnek	Chevron; ExxonMobil
McGivney Kluger	Caitlin Bodtmann	Madsen & Howell
O'Toole Scrivo	Dennise E. Mejia	E&B Mill Supply
Pascarella DiVita	Bradley F. Bishop	Ingersoll Rand
Reilly McDevitt	Adrianna Astringer	Cleaver Brooks
Tanenbaum Keale	Robert M. Gilmartin, Jr.	Foster Wheeler
Wilson Elser	Joseph Hanlon	Hess Corp.

IT IS on this 5th day of **June, 2018**, *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

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|--------------------|--|
| July 31, 2018 | Plaintiff shall serve answers to wrongful death interrogatories by this date. |
| June 29, 2018 | Defendants shall serve answers to standard interrogatories by this date. |
| August 17, 2018 | Plaintiff shall propound supplemental interrogatories and document requests by this date. |
| September 28, 2018 | Defendants shall serve answers to supplemental interrogatories and document requests by this date. |
| August 17, 2018 | Defendants shall propound supplemental interrogatories and document requests by this date. |

- September 28, 2018 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- November 2, 2018 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.
- November 2, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

- March 1, 2019 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- January 4, 2019 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.
- January 18, 2019 Summary judgment motions shall be filed no later than this date.
- February 15, 2019 Last return date for summary judgment motions.

MEDICAL DEFENSE

- July 31, 2018 Plaintiff shall serve executed medical authorizations by this date.
- January 11, 2019 Plaintiff shall serve medical expert reports by this date.
- March 29, 2019 Defendants shall identify its medical experts and serve medical 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.

LIABILITY EXPERT REPORTS

- January 11, 2019 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.
- March 29, 2019 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

- April 22, 2019 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

- April 11, 2019 @ 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.

May 20, 2019

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