

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

Docket No: **L-3835-13 (AS)**

Civil Action

CASE MANAGEMENT ORDER II

RONALD & ANNETTE DOUGLAS, <i>Plaintiff(s),</i>
vs.
ALCATEL-LUCENT USA, 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 March 30, 2016:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Rachel Placitella	Plaintiff(s)
Landman Corsi	John Bonventre	Anheuser-Busch Inc.
Gibbons PC	Ahmed Kassim	Alcatel-Lucent
Marks O'Neill	Paul Smyth	Superior Boiler Works; GPU Nuclear; JCP&L
McGivney Kluger	Joel Clark	DAP; Duro Dyne; Raritan Supply

IT IS on this 4th day of **April, 2016**, *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

May 31, 2016 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

April 25, 2016 @ 3:00pm Early **telephone** settlement conference. *Counsel shall contact the court the day before with the telephone number of the attorney handling the conference.*

SUMMARY JUDGMENT MOTION PRACTICE

June 10, 2016 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

June 24, 2016 Summary judgment motions shall be filed no later than this date.

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

MEDICAL DEFENSE

September 30, 2016 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

- August 31, 2016 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.
- September 30, 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

- October 14, 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

- To be scheduled Settlement Conference.
- October 31, 2016 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