

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

Docket No: L-4820-11 (AS)

Civil Action

CASE MANAGEMENT ORDER IX

THOMASINA FOWLER (Estate of Willis Edenfield), <i>Plaintiff(s),</i> vs. AKZO NOBEL CHEMICALS INC., 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 June 2, 2017:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s) <i>co-counsel with Szaferman Lakind</i>
Caruso Smith	Richard Picini	Union Carbide Corp.

IT IS on this 5th day of June, 2017, *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

July 3, 2017 Defendant Union Carbide shall move to add HM Royal as a third-party defendant no later than this date.

September 1, 2017 Depositions of corporate representatives shall be completed by this date.

EXPERT DEPOSITIONS

September 1, 2017 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

September 22, 2017 Pretrial Information Exchange submissions due.

October 10, 2017 (*Tuesday*) Trial-Ready 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