

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

Docket No: **L-2374-15 (AS)**

Civil Action

CASE MANAGEMENT ORDER IV

ESTATE of MICHAEL GILL,  <i>Plaintiff(s),</i>  vs. ADVANCED THERMAL HYDRONICS 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 23, 2016:

FIRM	ATTORNEY	CLIENT
Maune Raichle	Clay Thompson	Plaintiff(s) co-counsel with <i>Szaferman Lakind / Levy Konigsberg</i>
Caruso Smith Picini	Marcia DePolo	CertainTeed; Union Carbide
McElroy Deutsch	Andrew Bain	Burnham LLC
McGivney Kluger	Thomas B. McNulty	Weil McLain
Marks O'Neill	Sebastian Goldstein	Atlantic Plumbing
Hack Piro	Robert Alencewicz	HB Smith
O'Toole Fernandez	Gary Van Lieu	Peerless Industries, Inc.

IT IS on this 23<sup>rd</sup> day of June, 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**

July 29, 2016                      Discovery end date as to Ern Construction only.

**EARLY SETTLEMENT**

August 5, 2016                      Settlement demands shall be served on all counsel and the Special Master by this date.

**MEDICAL DEFENSE**

August 19, 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 19, 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.

**ECONOMIST EXPERT REPORTS**

August 5, 2016 Plaintiff shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

September 6, 2016 Defendants shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

**EXPERT DEPOSITIONS**

September 23, 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**

August 25, 2016 The settlement conference previously scheduled on this date is **cancelled**.

October 4, 2016 @ 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.

October 24, 2016 Trial Date. (*The September 26, 2016 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