

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

Docket No: L-451-18 (AS)

Civil Action

CASE MANAGEMENT ORDER I

SANDOR & ELEANOR GONCZLIK, <i>Plaintiff(s),</i>
vs.
AMERICAN BILTRITE INC., 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 *July 10, 2018*:

FIRM	ATTORNEY	CLIENT
Early Law Firm	Matthew Park	Plaintiff(s)
Caruso Smith	Marcia DePolo	CertainTeed
Gibbons PC	Ethan Stein	Honeywell International
Harris Beach	Matthew Quirin	Progress Lighting
Hoagland Longo	Julianne Kallas	York International
Kelley Jasons	Angela Caliendo	Square D
Lavin O'Neil	LaWanda D. White	Verizon
Leader Berkon	Christine Bucca	IMO Industries
Marshall Dennehey	Arthur Bromberg	Leviton
Marshall Dennehey	Paul Johnson	Warren Pumps
McElroy Deutsch	Brian Sorenson	Eaton
McGivney Kluger	Joel Clark	Atwood & Morrill; DAP; Nash Engineering; Gardner Denver
Pascarella DiVita	Joshua Greeley	Ingersoll Rand
Porzio Bromberg	Michelle Burke	AT&T Corp.; Alcatel-Lucent USA
Reilly McDevitt	Joshua Sonstein	Gould Electronics
Wilbraham Lawler	Lynn Roberts	Air & Liquid Systems s/b/m Buffalo Pumps

IT IS on this 11th day of **July, 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.

Defense counsel shall notify plaintiff's counsel within thirty (30) days of the date of this Order if their client was incorrectly named in the Complaint. Counsel may be barred from raising this defense at a later time for failure to comply.

DISCOVERY

July 27, 2018

Defendants shall serve answers to standard interrogatories by this date.

August 10, 2018 Plaintiff shall propound supplemental interrogatories and document requests by this date.

September 10, 2018 Defendants shall serve answers to supplemental interrogatories and document requests by this date.

August 10, 2018 Defendants shall propound supplemental interrogatories and document requests by this date.

September 10, 2018 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

October 31, 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.

October 31, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

October 26, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

October 26, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

November 9, 2018 Summary judgment motions shall be filed no later than this date.

December 7, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

October 9, 2018 Plaintiff shall serve medical expert reports by this date.

October 9, 2018 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

February 28, 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 14, 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.

February 28, 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

March 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

March 19, 2019 @ 1:30pm 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.

April 15, 2019 Pretrial Information Exchange submissions due.

April 22, 2019 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