

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

Docket No: L-3383-17 (AS)

Civil Action

CASE MANAGEMENT ORDER I

GERALDINE HAGAN (Estate of John Hagan III), vs. AIR & LIQUID SYSTEMS CORP., et al	<i>Plaintiff(s),</i> <i>Defendant(s).</i>
--	--

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on December 20, 2017:

FIRM	ATTORNEY	CLIENT
Weitz & Luxenberg	Robert Silverman	Plaintiff(s)
Gibbons PC	Daniel Dorfman	Honeywell International
Kelley Jasons	Angela Caliendo	FMC Corp.
Marshall Dennehey	Jeremy Zacharias	Warren Pumps, Inc.
Mayfield Turner	Sara Saltsman	Carrier Corp.
McGivney Kluger	Thomas McNulty	Blackmer
Reilly Janiczek	Ryan Notarangelo	Cleaver Brooks; Aurora Pump
Segal McCambridge	Audrey O. Anyaele	BW/IP
Tanenbaum Keale	Maryam Meseha	CBS/Westinghouse
Wilbraham Lawler	Benjamin Salvina	Air & Liquid Systems

IT IS on this 8th day of **January, 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

January 19, 2018 Defendants shall propound supplemental interrogatories and document requests by this date.

February 19, 2018 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

July 16, 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.

August 17, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

August 31, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

August 31, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

September 14, 2018 Summary judgment motions shall be filed no later than this date.

October 12, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

November 2, 2018 Plaintiff shall serve medical expert reports by this date.

January 4, 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

November 2, 2018 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.

January 4, 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

January 31, 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

To be scheduled Settlement conference.

February 25, 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