

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

Docket No: **L-3173-14 (AS)**

Civil Action

CASE MANAGEMENT ORDER II

RONALD & THERESA JONES, <i>Plaintiff(s),</i>
vs.
GENERAL ELECTRIC CO., 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 April 10, 2015:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph Mandia	Plaintiff(s)
Caruso Smith	Marcia DePolo	Union Carbide
Hawkins Parnell	Edward P. Abbot	Oakfabco
Latham & Watkins	Kegan A. Brown	Time Warner Companies, Inc.
Lynch Daskal	Alexandra Ober	Houghton Mifflin Harcourt Publishing Co.
Pascarella DiVita	Brad Bishop	Trane US, Inc.
Morgan Lewis	Christopher Iannicelli	Pearson Education Inc.; CBS Corp.; Simon & Shuster, Inc.
Sedgwick LLP	Afigo Fadahunsi	General Electric

IT IS on this 13th day of April, 2015 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

June 10, 2015 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.

July 10, 2015 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

July 17, 2015 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

July 24, 2015 Summary judgment motions shall be filed no later than this date.

August 21, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

June 10, 2015 Plaintiff shall serve medical expert reports by this date.

June 10, 2015 Plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

September 4, 2015 Defendants shall identify its medical experts and serve medical expert 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

July 10, 2015 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 4, 2015 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

July 10, 2015 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 4, 2015 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 25, 2015 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

July 8, 2015 The settlement conference previously scheduled on this date is **cancelled**.

October 1, 2015 @ 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.

10 business days prior to trial Pretrial Information Exchange.

November 2, 2015 Trial-Ready Date. (*The July 27, 2015 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
 Brody Deposition Services
 Priority One