

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

Docket No: L-6623-17 (AS)

Civil Action

CASE MANAGEMENT ORDER II

HSIU LING SU (Estate of Shwo Peng Rung), vs. CHATTEM INC., et al	<i>Plaintiff(s),</i> <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 November 5, 2018:

FIRM	ATTORNEY	CLIENT
Belluck & Fox	William Papain	Plaintiff(s)
McCarter & English	Jean Patterson	Johnson & Johnson
Rawle & Henderson	John McMeekin	Cyprus Amax Minerals; Imerys Talc America; Imerys Talc Vermont

IT IS on this 5th day of **November, 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.

DISCOVERY

- November 16, 2018 Cyprus Amax Minerals shall serve answers to standard interrogatories by this date.
- January 7, 2019 Imerys Talc Vermont shall serve answers to standard interrogatories by this date.
- November 16, 2018 Plaintiff shall propound supplemental interrogatories and document requests by this date.
- December 17, 2018 Cyprus Amax Minerals shall serve answers to supplemental interrogatories and document requests by this date.
- January 7, 2019 Imerys Talc Vermont shall serve answers to supplemental interrogatories and document requests by this date.
- November 16, 2018 Cyprus Amax Minerals shall propound supplemental interrogatories and document requests by this date.
- December 17, 2018 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

- December 14, 2018 Imerys Talc Vermont shall propound supplemental interrogatories and document requests by this date.
- January 14, 2019 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- December 14, 2018 Cyprus Amax Minerals and Imerys Talc Vermont shall advise plaintiff's counsel whether they wish to re-depose decedent's wife and daughter by this date.
- February 28, 2019 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.
- February 28, 2019 Depositions of corporate representatives shall be completed by this date.

MEDICAL DEFENSE

- January 7, 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

- February 28, 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.
- March 29, 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.

ECONOMIST EXPERT REPORTS

- December 31, 2018 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.
- February 28, 2019 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

- April 30, 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.

May 28, 2019 (*Tuesday*)

Trial Date. (*The February 25, 2019 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