

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

Docket No: **L-2882-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER II

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| CHRISTOPHER MORELLI (Estate of Michelle Morelli), <i>Plaintiff(s),</i> vs. HONEYWELL INTERNATIONAL 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 *December 6, 2013*:

| FIRM | ATTORNEY | CLIENT |
|-------------------------|------------------------|---------------|
| Cohen Placitella & Roth | Christopher Placitella | Plaintiff(s) |
| O'Toole Fernandez | Leslie Lombardy | RT Vanderbilt |

IT IS on this 9th day of **December, 2013** *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

- January 10, 2014 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- January 31, 2104 Depositions of corporate representatives shall be completed by this date. **(All documents shall be served at least 10 days prior to the corporate representative's deposition.)**

EARLY SETTLEMENT

- December 31, 2013 Settlement demands shall be served on all counsel and the Special Master by this date.
- February 12, 2014 The settlement conference previously scheduled on this date is **CANCELLED**.

SUMMARY JUDGMENT MOTION PRACTICE

February 28, 2014 Summary judgment motions limited to product identification issues shall be filed no later than this date.

March 28, 2014 Last return date for product identification summary judgment motions.

MEDICAL DEFENSE

December 31, 2013 Plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

February 28, 2014 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

LIABILITY EXPERT REPORTS

March 3, 2014 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.

April 4, 2014 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

April 4, 2014 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

May 5, 2014 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

April 15, 2014 @ 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.

May 19, 2014

Trial Date. (*The March 3, 2014 trial is adjourned to this date.*)

Plaintiff's counsel shall serve a copy of this Order upon any additional counsel immediately upon receipt.

/s/ Vincent Le Blon
VINCENT Le BLON, J.S.C.

cc: Clerk, Mass Tort
Brody Deposition Services
Priority One