

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

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

CHRISTOPHER MORELLI (Estate of Michelle Morelli),  vs.  HONEYWELL INTERNATIONAL INC., et al	<i>Plaintiff(s),</i>     <i>Defendant(s).</i>
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Civil Action

CASE MANAGEMENT ORDER V  
AMENDED

*This matter having previously come in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on July 30, 2015:*

FIRM	ATTORNEY	CLIENT
<i>Cohen Placitella &amp; Roth</i>	<i>Rachel Placitella</i>	<i>Plaintiff(s)</i>
<i>Shrader &amp; Associates</i>	<i>Allyson Romani</i>	<i>Plaintiff(s) co-counsel</i>
<i>O'Toole Fernandez</i>	<i>Joshua Lichtenstein</i>	<i>RT Vanderbilt</i>

**IT IS on this 15<sup>th</sup> day of JANUARY, 2016 that Case Management Order V is hereby**

**AMENDED 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**

April 8, 2016                      Depositions of corporate representatives shall be completed by this date.

**SUMMARY JUDGMENT MOTION PRACTICE**

April 8, 2016                      Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

April 15, 2016                      Summary judgment motions shall be filed no later than this date.

May 13, 2016                      Last return date for summary judgment motions.

**LIABILITY EXPERT REPORTS**

February 29, 2016                      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 29, 2016                      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 29, 2016 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 31, 2016 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

May 12, 2016 The settlement conference previously scheduled on this date is **cancelled**.

May 19, 2016 @ 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.

June 20, 2016 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