

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

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

Civil Action

CASE MANAGEMENT ORDER VI
AMENDED

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| CHRISTOPHER MORELLI (Estate of Michelle Morelli), vs. HONEYWELL INTERNATIONAL INC., et al | <i>Plaintiff(s),</i> <i>Defendant(s).</i> |
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This matter having previously come in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on March 30, 2016:

| FIRM | ATTORNEY | CLIENT |
|------------------------------------|----------------------------|--------------------------------|
| <i>Cohen Placitella & Roth</i> | <i>Rachel Placitella</i> | <i>Plaintiff(s)</i> |
| <i>Shrader & 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 27th day of JUNE, 2016, Case Management Order VI 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

August 31, 2016 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 31, 2016 Depositions of corporate representatives shall be completed by this date.

SUMMARY JUDGMENT MOTION PRACTICE

September 16, 2016 Summary judgment motions shall be filed no later than this date.

October 14, 2016 Last return date for summary judgment motions.

LIABILITY EXPERT REPORTS

October 12, 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

October 12, 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

November 11, 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

July 6, 2016 The settlement conference previously scheduled on this date is **cancelled**.

October 27, 2016 @ 10:00am **Telephone** settlement conference. *Counsel shall contact the court the day before with the telephone number of the attorney handling the conference.*

December 5, 2016 Trial Date. *(The September 19, 2016 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