

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

CHRISTOPHER MORELLI (Estate of Michelle Morelli), vs. HONEYWELL INTERNATIONAL INC., et al	<i>Plaintiff(s),</i> <i>Defendant(s).</i>
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Docket No: **L-2882-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER VI

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on March 30, 2016:

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

IT IS on this 4th day of **April, 2016**, *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

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

SUMMARY JUDGMENT MOTION PRACTICE

June 10, 2016 Summary judgment motions shall be filed no later than this date.

July 8, 2016 Last return date for summary judgment motions.

LIABILITY EXPERT REPORTS

May 6, 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.

July 6, 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

July 6, 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

August 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 19, 2016 The settlement conference previously scheduled on this date is **cancelled**.

July 6, 2016 @ 10:00am **Telephone** settlement conference. *Counsel shall contact the court the day before with the telephone number of the attorney handling the conference.*

September 19, 2016 Trial Date. *(The June 20, 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