

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

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

Civil Action

CASE MANAGEMENT ORDER VII

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 having previously come in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on March 30, 2016 and amended on June 27, 2016 and the parties having agreed upon certain extensions;*

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 30<sup>th</sup> day of SEPTEMBER, 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**

September 30, 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.

September 30, 2016      Depositions of corporate representatives shall be completed by this date.

**SUMMARY JUDGMENT MOTION PRACTICE**

November 4, 2016      Summary judgment motions shall be filed no later than this date.

December 2, 2016      Last return date for summary judgment motions.

**LIABILITY EXPERT REPORTS**

November 11, 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**

November 11, 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**

February 28, 2017 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**

October 27, 2016 The telephone settlement conference previously scheduled on this date is **cancelled**.

December 5, 2016 @ 1:30pm **Telephone** settlement conference. *Counsel shall contact the court the day before with the telephone number of the attorney handling the conference.*

To be scheduled Final settlement conference.

April 3, 2017 Trial Date. *(The December 5, 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