

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

DELIMIRO & LUZ PEREZ,  vs.  AMPACET CORP., et al	<i>Plaintiff(s),</i>    <i>Defendant(s).</i>
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Docket No: **L-5111-13(AS)**

Civil Action

CASE MANAGEMENT ORDER IX

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on October 1, 2015:

FIRM	ATTORNEY	CLIENT
Lanier Law Firm	Darron Berquist	Plaintiff(s) Counsel <i>(co-counsel with Wilentz Goldman &amp; Spitzer)</i>
Hawkins Parnell	Roy Viola	Celanese
Kelley Jasons	Angela Caliendo	FMC; Gen Corp.
Littleton Joyce	Christine Delaney	Ren / BASF Corp.
Locke Lord	Aileen McTiernan	Alcatel-Lucent USA Inc.
Margolis Edelstein	Justin M. Bettis	CP Chemical
McElroy Deutsch	Donna duBeth Gardiner	Allen Bradley
McGivney Kluger	William Sanders	Rogers Corp.; Simplotmatic
Pepper Hamilton	Jeff Carr	Honeywell International
Porzio Bromberg	Michelle Burke	DuPont; Cytec Engineered Materials; Wyeth Holdings; Eastman Chemical
Sedgwick LLP c/o Speziali	Joanne Hawkins	CBS

IT IS on this 1<sup>st</sup> day of **October, 2015** 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**

December 18, 2015      Depositions of corporate representatives shall be completed by this date.

**EARLY SETTLEMENT**

December 31, 2015      Settlement demands shall be served on all counsel and the Special Master by this date.

**SUMMARY JUDGMENT MOTION PRACTICE**

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

February 5, 2016      Summary judgment motions shall be filed no later than this date.

March 4, 2016 Last return date for summary judgment motions.

**MEDICAL DEFENSE**

December 1, 2015 Defendants shall serve expert medical reports no later than this date.

**LIABILITY EXPERT REPORTS**

January 15, 2016 Plaintiff shall serve amended/supplemental expert liability report, if any, by this date.

March 31, 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.

April 29, 2016 Plaintiff shall identify its rebuttal liability experts and serve rebuttal liability expert reports, if any, by this date.

**EXPERT DEPOSITIONS**

May 27, 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**

November 20, 2015 The settlement conference previously scheduled on this date is **cancelled**.

May 20, 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. *(The January 25, 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: counsel:

Baginski Mezzanotte

cc: Clerk, Mass Tort