

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

DAVID & DIANE RASA, <i>Plaintiff(s),</i> vs. AO SMITH WATER PRODUCTS, et al <i>Defendant(s).</i>
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Docket No: L-7007-17 (AS)

Civil Action

CASE MANAGEMENT ORDER II

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on November 30, 2018:

FIRM	ATTORNEY	CLIENT
Weitz & Luxenberg	Robert Silverman	Plaintiff(s)
Caruso Smith	Nicholas Albano, III	Union Carbide
Clyde & Co.	Kevin Turbert	Burnham
Delany McBride	Gaston Loomis	Peerless, Ind.
Fox Rothschild	Andrew Karas	Kuiken Brothers
Hack Piro	Christian Corro	HB Smith Co., Inc.
Hoagland Longo	Marc S. Gaffrey	Kohler Co.
Jones Law Office	Richard V. Jones	Metropolitan Life
McCarter & English	Jean Patterson	Fisher Scientific
McGivney Kluger	Thomas McNulty	DAP
Reilly McDevitt	Brandy Harris	Hilco, Inc.

IT IS on this 3rd day of **December, 2018**, *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.

Defense counsel shall notify plaintiff's counsel within thirty (30) days of the date of this Order if their client was incorrectly named in the Complaint. Counsel may be barred from raising this defense at a later time for failure to comply.

Any jurisdictional motions must be filed in accordance with the Court Rules or be waived.

Any *forum non conveniens* motions must be filed as soon as practicable; once sufficient discovery is conducted so that the motion may be properly brought.

EXPERT DEPOSITIONS

February 11, 2019 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

February 8, 2019 @ 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.

February 25, 2019 Pretrial Information Exchange submissions due.

March 4, 2019 Trial-Ready 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