

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

<p>DOROTHY &amp; JOHN J. REDMOND,</p> <p style="text-align: center;"><i>Plaintiff(s),</i></p> <p style="text-align: center;">vs.</p> <p>3M COMPANY, et al</p> <p style="text-align: center;"><i>Defendant(s).</i></p>
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Docket No: **L-616-14 (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 September 12, 2014:

FIRM	ATTORNEY	CLIENT
Seeger Weiss	Dennis Geier	Plaintiff(s)
Baginski Mezzanotte	Patricia Lyons	HM Royal
Bucca & Campisano	Christine Bucca	IMO Industries
Caruso Smith Picini	Ronald Suss	Union Carbide; CertainTeed
Gibbons PC	Ahmed Kassim	Honeywell International
Kelley Jasons	Angela Caliendo	Nibco; Ricwil
Lavin O'Neil	Catherine Brunermer	3M Company
Margolis Edelstein	J. Edmund Bryak	Columbia Boiler Co.
Marks O'Neill	Dennis Schmieder	GPU Energy; Honeywell
Maron Marvel	Carolyn Williams	Industrial Holdings Corp.
Marshall Dennehey	Paul Johnson	Kaiser Gypsum; Riley Power
Mayfield Turner	Joshua Locke	Carrier Corp.
McCarter & English	John Garde	Fisher Controls
McElroy Deutsch	Joseph D. Rasnek	AO Smith Water Products; Flowserve; Burnham
O'Toole Fernandez	Leslie Lombardy	Dana; Peerless Industries
Pascarella DiVita	Michael A. Posavetz	Ingersoll Rand; Trane US Inc.
Pepper Hamilton	John Brenner	Bristol Myers Squibb
Reilly Janiczek	Edward Kang	ITT; Aurora; Cleaver Brooks
Segal McCambridge	John Guerriero	BW/IP
Speziali Greenwald	Michael Quinn	General Electric; Foster Wheeler; CBS
Wilbraham Lawler	Elizabeth deBerardinis	PSE&G

IT IS on this 15<sup>th</sup> day of September, 2014 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**

- September 30, 2014 Defendants shall serve answers to standard interrogatories by this date.
- October 17, 2014 Defendants shall serve answers to supplemental interrogatories and document requests by this date.
- October 17, 2014 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- December 31, 2014 Plaintiff depositions shall be concluded by this date. Plaintiff's counsel shall contact the Special Master within one week of this deadline if plaintiff depositions are not completed by this date.
- January 30, 2015 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.
- February 16, 2015 Depositions of corporate representatives shall be completed by this date.

## **EARLY SETTLEMENT**

- February 16, 2015 Settlement demands shall be served on all counsel and the Special Master by this date.

## **SUMMARY JUDGMENT MOTION PRACTICE**

- March 13, 2015 Summary judgment motions shall be filed no later than this date.
- April 10, 2015 Last return date for summary judgment motions.

## **MEDICAL DEFENSE**

- May 8, 2015 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date. **In addition, defendants shall notify plaintiff's counsel (as well as all counsel of record) of a joinder in an expert medical defense by this date.**

## **LIABILITY EXPERT REPORTS**

- March 13, 2015 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.
- May 8, 2015 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.

## **EXPERT DEPOSITIONS**

- May 29, 2015 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**

December 16, 2014                      The settlement conference previously scheduled on this date is **cancelled**.

May 12, 2015 @ 1:30pm              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 15, 2015                      Trial Date. (*The January 12, 2015 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  
            Brody Deposition Services  
            Priority One