

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

<p>DOROTHY &amp; JOHN J. REDMOND, <i>Plaintiff(s),</i></p> <p>vs.</p> <p>3M COMPANY, et al <i>Defendant(s).</i></p>
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Docket No: **L-616-14 (AS)**

Civil Action

CASE MANAGEMENT ORDER IV

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on August 21, 2015:

FIRM	ATTORNEY	CLIENT
Simmons Hanly Conroy	Laurence Nassif	Plaintiff(s)
Baginski Mezzanotte	Erik Ortega	HM Royal; Viking Pump
Bucca & Campisano	Benjamin Bucca	IMO
Budd Lerner	Terence Camp	Goodyear Tire & Rubber
Caruso Smith	Joyce Min	Union Carbide; CertainTeed
Connell Foley	Richard Jagen	August Arace
Eckert Seamans	David Katzenstein	AO Smith Water Products
Hardin Kundla	Joshua Fischer	Calon Insulation; Strahman Valves
Hoagland Longo	Steven F. Satz	Goulds Pumps; Johnston Controls; EMCO Fittings
Kelley Jasons	Joseph Vassalotti	Nibco; Ricwil
Kent McBride	Revi Shah	Binsky; Marsam
Lavin O'Neil	Catherine Brunermer	3M Company
Margolis Edelstein	Justin M. Pettis	Central Jersey; United Engineers; Ideal Supply; Columbia Boiler; Woollulate
Marks O'Neill	Sebastian Goldstein	GPU Energy; Honeywell; Nicholas Schwalje
Maron Marvel	Carolyn Williams	Industrial Holdings Corp.
Marshall Dennehey	Paul Johnson	Kaiser Gypsum; Riley Power
Mayfield Turner	Jacob Crockett	Carrier Corp.
McCarter & English	John C. Garde	Fisher Controls
McElroy Deutsch	Gabriel Ferstendig	Burnham; Flowserve US Inc.; Pfizer
McGivney Kluger	Nicholas DeMattheis	Taco; Weil McLain; Zurn; Raritan
Morgan Lewis	Christopher Iannicelli	ITT Corp.
O'Brien Firm	Brian P. Lawlor	American Industrial Supply
O'Toole Fernandez	John V. Kelly	Peerless; Dana
Pascarella DiVita	Michael A. Posavetz	Trane US Inc.; Crane Co.
Pepper Hamilton	Jeffrey Carr	Allied Chemical; Honeywell Int'l as successor to Wilpette Cake Oven
Pepper Hamilton	Nicholas Kaulestu	Bristol Myers Squibb
Reilly Janiczek	Brandy Harris	Aurora; Cleaver Brooks
Ricci Tyrell	Nancy Green	Fluidics
Sedgwick LLP	Afigo Fadahunsi	Flowserve d/b/a Wilson-Snyder Pumps; Foster Wheeler; CBS/Westinghouse; General Electric

Tierney Law	Mark Turner	AJ Friedman Supply Co.
Vasios Kelly	Thomas J. Kelly, Jr.	Armstrong Int'l, Inc.
Wilbraham Lawler	Elizabeth duBerardinis	PSE&G; Air Con

IT IS on this 24<sup>th</sup> day of August, 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**

September 30, 2015 Plaintiff shall serve answers to wrongful death interrogatories by this date.

February 29, 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.

March 31, 2016 Depositions of corporate representatives shall be completed by this date.

### **EARLY SETTLEMENT**

April 1, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

### **SUMMARY JUDGMENT MOTION PRACTICE**

April 15, 2016 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

April 29, 2016 Summary judgment motions shall be filed no later than this date.

May 27, 2016 Last return date for summary judgment motions.

### **MEDICAL DEFENSE**

April 1, 2016 Plaintiff shall serve medical expert reports, if any, by this date and transfer pathology to Reilly Janiczek.

June 30, 2016 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**

April 22, 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.

June 30, 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.

**EXPERT DEPOSITIONS**

August 15, 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 5, 2015

The settlement conference previously scheduled on this date is **cancelled**.

August 11, 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.

September 12, 2016

Trial Date. (*The December 7, 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