

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

Docket No: L-7305-15 (AS)

Civil Action

CASE MANAGEMENT ORDER IV

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| WILLIAM & CONNIE SAVAGE, <i>Plaintiff(s),</i> |
| vs. |
| AT&T CORPORATION, et al <i>Defendant(s).</i> |

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on August 8, 2017:

| FIRM | ATTORNEY | CLIENT |
|-------------------------|-------------------|---|
| Cohen Placitella & Roth | Rachel Placitella | Plaintiff(s) |
| Caruso Smith | Lisa Massimi | CertainTeed; Union Carbide |
| Connell Foley | Scott Press | Superior Welding Supply Co. |
| Hardin Kundla | Nicea D'Annunzio | Calon Insulation |
| Kelley Jasons | Angela Caliendo | FMC Corp. |
| Margolis Edelstein | Jeanine D. Clark | Central Jersey Supply |
| Marks O'Neill | Sophia Tyriss | Bayonne Plumbing |
| Marshall Dennehey | Kevin Bright | Warren Pumps |
| McGivney Kluger | Kevin Hoffman | Binsky & Snyder; Mooney Bros.; Koenig |
| Pascarella DiVita | Gabriel Miller | Ingersoll Rand |
| Porzio Bromberg | Ahmed J. Kassim | AT&T Corp. |
| Speziali Greenwald | Joanne Hawkins | General Electric |
| Styliades Mezzanotte | Lisa R. Marshall | HM Royal Inc. |
| Swartz Campbell | William Morlok | Allied Glove |
| Tanenbaum Keale | Afigo Fadahunsi | CBS; Foster Wheeler |
| Tierney Law Office | Brian Garbacz | Elizabeth Industrial |
| Wilbraham Lawler | Matthew Jones | Green Tweed; Air & Liquid Systems Corp. |

IT IS on this 9th day of **August, 2017**, *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 29, 2017 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.

December 29, 2017 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

February 2, 2018 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

February 2, 2018 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

February 16, 2018 Summary judgment motions shall be filed no later than this date.

March 16, 2018 Last return date for summary judgment motions.

MEDICAL DEFENSE

April 6, 2018 Defendants shall identify its medical experts and serve medical 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

February 9, 2018 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.

April 6, 2018 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

April 27, 2018 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 14, 2017 The settlement conference previously scheduled on this date is **cancelled**.

April 19, 2018 @ 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.

May 11, 2018

Pretrial Information Exchange Form due.

May 21, 2018

Trial-Ready Date. (*The December 11, 2017 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