

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

**Docket No:** L-1125-14 (AS)

**Civil Action**

**CASE MANAGEMENT ORDER XVIII**

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| ESTATE of JOACHIM SCHWIEDOP,<br><i>Plaintiff(s),</i> |
| vs.  |
| 3M COMPANY, et al<br><i>Defendant(s).</i>            |

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on June 7, 2019:

| FIRM            | ATTORNEY         | CLIENT       |
|-----------------|------------------|--------------|
| Levy Konigsberg | Robert Ellis     | Plaintiff(s) |
| Clyde & Co.     | Kevin Turbert    | Burnham LLC  |
| McElroy Deutsch | Joseph D. Rasnek | Exxon        |
| McGivney Kluger | Caitlin Bodtmann | DAP          |

IT IS on this 10<sup>th</sup> day of June 2019 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.

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.

**MEDICAL EXPERT REPORT**

August 30, 2019 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**

August 30, 2019 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**

September 27, 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**

To be scheduled                      Settlement conference.

October 21, 2019                      Trial Date. *(The July 8, 2019 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