

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

ARTHUR & GLORIA STAUCH,  <i>Plaintiff(s),</i>  vs.  ABB INC., et al  <i>Defendant(s).</i>
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Docket No: **L-7835-12 (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 February 6, 2015:

FIRM	ATTORNEY	CLIENT
Lanier Law Firm	Darron Berquist	Plaintiff(s) co-counsel <i>Cohen Placitella &amp; Roth (Plaintiff's counsel)</i>
Gold Albanese Barletti	James Barletti	Wakefern

IT IS on this 9<sup>th</sup> day of **February, 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**

March 13, 2015            Depositions of corporate representatives shall be completed by this date.

**DISPOSITIVE MOTIONS**

April 10, 2015            Dispositive motions shall be filed by this date.

May 8, 2015              Return date for dispositive motions.

**MEDICAL DEFENSE**

April 13, 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**

April 13, 2015                      Defendants shall identify its liability and medical experts and serve liability and medical expert reports, if any, by this date or waive any opportunity to rely on expert testimony.

### **EXPERT DEPOSITIONS**

May 15, 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**

May 28, 2015 @ 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.

June 8, 2015                      Trial Date. (*The February 23, 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