

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

Docket No: **L-6763-09 (AS)**

Civil Action

CASE MANAGEMENT ORDER I

JOSEPH TELLADO (Estate of Fred Tellado), <i>Plaintiff(s),</i> vs. FMC CORPORATION, et al <i>Defendant(s).</i>
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This matter coming in for a Case Management Conference with Special Master, Agatha N. Dzikiewicz, on April 2, 2013 and the following firms appearing:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Rachel Placitella	Plaintiff(s)
Kelley Jasons	Joseph Vassalotti	FMC
McGivney Kluger	Thomas McNulty	Resco Holdings

IT IS on this 3rd day of April, 2013 *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*.

Defense counsel shall notify plaintiffs' counsel within thirty (30) days of the date of this Order if their client was incorrectly named in the Complaint. Counsel may be barred from raising this defense at a later time for failure to comply.

DISCOVERY

May 3, 2013 Plaintiff shall serve answers to standard interrogatories, provide the information required by paragraph VI.B.1.a. of the General Order, and shall advise defendants whether the plaintiff is available for deposition and, if not, the reasons therefore by this date.

May 3, 2013 Plaintiff shall serve answers to wrongful death interrogatories by this date.

May 3, 2013 Plaintiff shall propound supplemental interrogatories and document requests by this date.

May 31, 2013 Defendants shall serve answers to supplemental interrogatories and document requests by this date.

May 10, 2013 Defendants shall propound supplemental interrogatories and document requests by this date.

May 31, 2013 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

July 31, 2013 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.

June 28, 2013 Depositions of corporate representatives shall be completed by this date.

CASE MANAGEMENT CONFERENCE

June 27, 2013 @ 9:45am Case Management Conference is scheduled before the Special Master.

PRE-TRIAL AND TRIAL

To be scheduled Settlement conference.

October 28, 2013 Trial Date.

Plaintiff's counsel shall serve a copy of this Order upon any additional counsel immediately upon receipt.

/s/ Vincent Le Blon
VINCENT Le BLON, J.S.C.

cc: Clerk, Mass Tort
Brody Deposition Services
Priority One