

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

**Docket No:** L-6196-16 (AS)

**Civil Action**

**CASE MANAGEMENT ORDER III**

ESTATE of LEROY VARI,  vs.  CHICAGO BRIDGE & IRON CO., et al	<i>Plaintiff(s),</i>    <i>Defendant(s).</i>
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This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on *January 22, 2019*:

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Rachel Placitella	Plaintiff(s)
Rawle & Henderson	Joshua Lichtenstein	Nicholas Schwalje, Inc.
Ricci Tyrrell	Stuart Goldstein	Chicago Bridge & Iron
Tanenbaum Keale	James Keale	Foster Wheeler
Wilson Elser	Joseph Hanlon	Chevron

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

**DISCOVERY**

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|----------------|--|
| March 29, 2019 | Plaintiff shall serve answers to standard interrogatories.   |
| March 29, 2019 | Plaintiff shall serve answers to wrongful death interrogatories by this date.                      |
| April 19, 2019 | Defendants shall serve answers to standard interrogatories by this date.                           |
| May 3, 2019    | Plaintiff shall propound supplemental interrogatories and document requests by this date.          |
| June 7, 2019   | Defendants shall serve answers to supplemental interrogatories and document requests by this date. |
| May 3, 2019    | Defendants shall propound supplemental interrogatories and document requests by this date.         |

June 7, 2019 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

August 9, 2019 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.

August 9, 2019 Depositions of corporate representatives shall be completed by this date.

**CASE MANAGEMENT CONFERENCE**

August 14, 2019 @ 10:00am Case Management Conference is scheduled before the Special Master.

All other deadlines in CMO II are hereby vacated and will be addressed at the Case Management Conference.

***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