

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

Docket No: L-5558-17 (AS)

Civil Action

CASE MANAGEMENT ORDER II

DAVID WILLIAMS (Estate of Nancy Williams), vs. 3M COMPANY, 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 September 18, 2018:

FIRM	ATTORNEY	CLIENT
Locks Law Firm	Alfred Anthony	Plaintiff(s)
Breuninger Fellman	Kathleen Ramalho	National Automotive Parts Association
Caruso Smith	Thomas M. Rogers	CertainTeed
Delany McBride	Brian Bently	Peerless Ind.
Eckert Seamans	Michael A. Posavetz	AO Smith Water Products Co.
Gibbons PC	Ethan Stein	Honeywell International
Hack Piro	Robert Alencewicz	HB Smith
Harwood Lloyd	Victoria Silva	Carlisle
Hoagland Longo	Ibrahim Kosoko	Kohler Co.; Essex Plumbing
Landman Corsi	Gregory Damico	Fel-Pro; ECR
Lavin O'Neil	Catherine Brunermer	3M Co.
LeClair Ryan	Gary M. Sapir	Ford Motor Co.
Lewis Brisbois	Kathleen Trabold	Henkel Corp.
Margolis Edelstein	Nicholas Sulpizio	General Plumbing Supply
Marshall Conway	Stacey Snyder	Slant Fin Corp.
Marshall Dennehey	Paul Johnson	Jaeger Lumber; Pep Boys
McGivney Kluger	Joel Clark	DAP; Weil McLain
Methfessel Werbel	Olivia R. Licata	AutoZone
Pascarella DiVita	Bradley E. Bishop	Trane US
Rawle & Henderson	Sebastian Goldstein	Hajoca
Segal McCambridge	Alexander Schaffel	Tenneco Automotive
Swartz Campbell	Patrick Fitzmaurice	Samuels, Inc.
Vasios Kelly	Thomas J. Kelly, Jr.	Bird, Inc.
Wilbraham Lawler	Lynne E. Roberts, III	Karnak Corp.

IT IS on this 18th day of September, 2018, 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

November 14, 2018 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.

November 14, 2018 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

January 4, 2019 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

January 4, 2019 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

January 18, 2019 Summary judgment motions shall be filed no later than this date.

February 15, 2019 Last return date for summary judgment motions.

MEDICAL DEFENSE

October 19, 2018 Plaintiff shall serve executed medical authorizations by this date.

December 19, 2018 Plaintiff shall serve medical expert reports by this date.

April 5, 2019 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

December 19, 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 5, 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.

ECONOMIST EXPERT REPORTS

December 19, 2018 Plaintiff shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

April 5, 2019 Defendants shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

EXPERT DEPOSITIONS

April 30, 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

February 6, 2019 The settlement conference previously scheduled on this date is **cancelled**.

April 24, 2019 @ 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 28, 2019 (*Tuesday*) Trial Date. (*The March 25, 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