

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

Docket No: **L-2600-14 (AS)**

PANTELIS ZABOGLU,  
  
*Plaintiff(s),*  
  
vs.  
  
ABD ELECTRICAL SUPPLY CO., et al  
  
*Defendant(s).*

Civil Action

CASE MANAGEMENT ORDER I

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on September 16, 2014:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph J. Mandia	Plaintiff(s)
Edwards Wildman	Gerard Abate	Alcatel-Lucent USA Inc.
Forman Perry	Thomas M. Toman, Jr.	Cooper Industries
Hoagland Longo	Nora Grimbergen	Siemens Industries; WW Grainger
Kelley Jasons	Joseph Vassalotti	Square D
Margolis Edelstein	Ryan Buchanan	Belden Wire & Cable Co.
Mayfield Turner	Sara Saltsman	Carrier Corp.
McElroy Deutsch	Kathryn Carey	Allen Bradley
O'Toole Fernandez	Leslie Lombardy	Gould Electronics
Pascarella DiVita	Corinne Cerrati	ABD Electrical
Reilly Janiczek	Steven A. Jenks, Jr.	Cleaver Brooks Inc.
Speziali Greenwald	Michael Quinn	CBS/Westinghouse; General Electric
Wilbraham Lawler	Andrea Greco	Buffalo Pumps

IT IS on this 17<sup>th</sup> day of September, 2014 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

- September 23, 2014 Defendants shall serve answers to standard interrogatories by this date.
- September 26, 2014 Plaintiff shall propound supplemental interrogatories and document requests by this date.
- October 24, 2014 Defendants shall serve answers to supplemental interrogatories and document requests by this date.
- September 26, 2014 Defendants shall propound supplemental interrogatories and document requests by this date.
- October 24, 2014 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
- November 28, 2014 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 28, 2014 Depositions of corporate representatives shall be completed by this date.

## EARLY SETTLEMENT

- November 28, 2014 Settlement demands shall be served on all counsel and the Special Master by this date.

## SUMMARY JUDGMENT MOTION PRACTICE

- December 12, 2014 Summary judgment motions shall be filed no later than this date.
- January 9, 2015 Last return date for summary judgment motions.

## MEDICAL DEFENSE

- November 28, 2014 Plaintiff shall serve medical expert reports by this date.
- November 28, 2014 Plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.
- January 30, 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

- November 28, 2014 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.

January 30, 2015 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**

November 28, 2014 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.

January 30, 2015 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**

February 20, 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**

February 4, 2015 @ 1:30pm 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.

March 9, 2015 Trial 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