

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

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

Civil Action

CASE MANAGEMENT ORDER II

<p>PANTELIS ZABOGLU,</p> <p style="text-align: center;"><i>Plaintiff(s),</i></p> <p style="text-align: center;">vs.</p> <p>ABD ELECTRICAL SUPPLY CO., et al</p> <p style="text-align: center;"><i>Defendant(s).</i></p>

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on October 9, 2014:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Erica Cesaro	Plaintiff(s)
Day Pitney	Rasika Chakravarthy	Pehlps Dodge Ind., Inc.
Forman Perry	Thomas M Toman, Jr.	Cooper Industries
Hoagland Longo	Nora Grimbergen	Siemens Industries; WW Grainger
Kelley Jasons	Angela Caliendo	Square D
Margolis Edelstein	Ryan Buchanan	Belden Wire & Cable Co.
Mayfield Turner	Andrew Keith	Carrier Corp.
McElroy Deutsch	Michelle Hydrusko	Allen Bradley
McGivney Kluger	Joel Clark	Killark; CCX, Inc.; Standard Wire
O'Brien Firm	Ingrid H. Graff	ABB Inc.
O'Toole Fernandez	Casey Chamra	Gould Electronics
Pascarella DiVita	Joshua Greeley	ABD Electrical
Reilly Janiczek	Steven A. Jenks	Cleaver Brooks Inc.
Speziali Greenwald	Michael Quinn	CBS/Westinghouse; General Electric; Brent Electric
Wilbraham Lawler	Andrea Greco	Buffalo Pumps

IT IS on this 14th day of **October, 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.

DISCOVERY

November 28, 2014 Plaintiff shall serve answers to wrongful death interrogatories by this date.

October 31, 2014 Defendants shall serve answers to standard interrogatories by this date.

November 28, 2014 Plaintiff shall propound supplemental interrogatories and document requests by this date.

January 2, 2015 Defendants shall serve answers to supplemental interrogatories and document requests by this date.

November 28, 2014 Defendants shall propound supplemental interrogatories and document requests by this date.

January 2, 2015 Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.

January 30, 2015 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.

February 27, 2015 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

May 1, 2015 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

March 27, 2015 Summary judgment motions shall be filed no later than this date.

April 24, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

December 31, 2014 Plaintiff shall serve updated medical authorizations by this date.

March 31, 2015 Plaintiff shall serve medical expert reports by this date.

May 29, 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

March 31, 2015 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.

May 29, 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.

EXPERT DEPOSITIONS

June 19, 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

June 18, 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.

July 13, 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