

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

PANTELIS ZABOGLU,  vs.  ABD ELECTRICAL SUPPLY CO., et al	<i>Plaintiff(s),</i>   <i>Defendant(s).</i>
--	--

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

Civil Action

CASE MANAGEMENT ORDER VII

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on March 1, 2016:

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Amber Long	Plaintiff(s)
Day Pitney	Naju Lathia	Phelps Dodge Ind., Inc.
Hoagland Longo	Jillian Madison	WW Grainger
Kelly Jasons	Angela Caliendo	Square D
Marshall Dennehey	Paul Johnson	AIW Leviton
Mayfield Turner	Jacob Crockett	Carrier Corp.
McElroy Deutsch	Joseph D. Rasnek	Allen Bradley; Colgate Palmolive; AT&T
McGivney Kluger	Thomas McNulty Caitlin Christie	Killark; CCX, Inc.; Standard Wire; Madsen & Howell
Pascarella DiVita	Madelyn Iulo	ABD Electrical
Reilly Janiczek	Matthew Franson	Cleaver Brooks Inc.; Gould Electronics Inc.
Sedgwick LLP	David Blow	CBS/Westinghouse
Wilbraham Lawler	Tristin Fabro	Air & Liquid Systems Corp.; Siemens

IT IS on this 2<sup>nd</sup> day of March, 2016 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**

June 3, 2016 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.

July 8, 2016 Depositions of corporate representatives shall be completed by this date.

### EARLY SETTLEMENT

July 15, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

### SUMMARY JUDGMENT MOTION PRACTICE

July 22, 2016 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

August 5, 2016 Summary judgment motions shall be filed no later than this date.

September 2, 2016 Last return date for summary judgment motions.

### MEDICAL DEFENSE

July 29, 2016 Plaintiff shall serve medical expert reports by this date.

July 29, 2016 Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

October 14, 2016 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

July 29, 2016 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.

October 14, 2016 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

November 11, 2016 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

August 2, 2016 The settlement conference previously scheduled on this date is **cancelled**.

November 2, 2016 @ 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.

December 5, 2016

Trial Date. (*The August 29, 2016 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