

FILED

JAN 19 2007

~~ESTER D. GARRUTO, J.S.C~~

CYNTHIA DUNSMOOR

Plaintiff,

5.

**AMERICAN HOME PRODUCTS
CORPORATION. et al.,**

Defendants.

**SUPERIOR COURT OF
MIDDLESEX COUNTY**

DOCKET NO. MID-L-8149-04

CASE CODE NO. 264

**CONSENT ORDER
SCHEDULING
DISCOVERY DEADLINES**

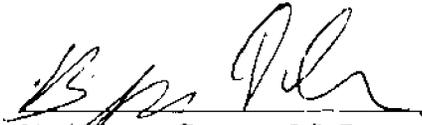
This matter having been **the** subject of a case management conference on **August 31, 2006**, and with *the* consent of counsel for plaintiffs, Levin, Fishbein, Sedran & Berman, Michael Weinkowitz, Esq., and Porzio, Bromberg & Newman, P.C., counsel for American Home Products, et al. (Wyeth), Frank Fazio, Esq., and for good cause shown:

IT IS on this 19th day of January 2007, **ORDERED** as follows:

1. All fact discovery including the deposition of all fact witnesses shall be completed on or before **April 4, 2007**.
2. Plaintiffs shall serve case-specific liability and damages expert reports on or before **April 25, 2007**;
3. All IMEs shall be completed by **May 9, 2007**;
4. Defendant Wyeth shall serve case-specific liability and damages expert reports on or before **May 23, 2007**.
5. No Expert depositions shall be taken until after the parties have exchanged all case-specific liability and damages expert reports.
6. The parties shall file and serve on or before **July 10, 2007**:

- a) Dispositive and case-specific Kemp motions
7. The parties shall file and serve on or before **August 7, 2007**:
 - b) *In limine* Motions
Exhibits and Exhibit Lists
 - d) Witness Lists
 - e) Deposition Designations
 - f) Opposition to Dispositive and case-specific Kemp motions
8. The parties shall serve and file objections to deposition designations and deposition counter-designations on **August 14,2007**:
9. The parties shall serve and file on August **15, 2007**:
 - a) Opposition papers to *In limine* Motions and.
 - b) Opposition to any Exhibits
10. The parties shall serve and file on **August 17,2007**:
 - a) Reply papers to opposition papers to Dispositive motions and case-specific
Kemp Motions
11. The parties shall serve and file their final exhibit list on **August 21, 2007**;
12. The parties shall serve and file on **August 23, 2007**:
 - a) Reply papers to opposition papers to *in limine* motions
13. The parties shall serve and file trial briefs on **August 27,2007**;

14. The trial in this matter will be held on **September 4, 2007, at 9:00 a.m.**



Hon. Bryan Garruto, J.S.C.
Supervising Judge for Mass Tort Section

THE PARTIES SO CONSENT



Michael M. Weinkowitz
Levin, Fishbein, Sedran & Berman
Attorneys for Plaintiff



Frank Fazio
Porzio, Bromberg & Newman, P.C.
Attorneys for Defendants