
MARLENE BERNETT

Plaintiff,

v.

THE AMERICAN TOBACCO COMPANY,
INC., et al.

Defendants.

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
MIDDLESEX COUNTY
DOCKET NO. L-5542-00 MT**

**CIVIL ACTION
TOBACCO LITIGATION
Case Code 241**

RECOMMENDATION

THIS MATTER having been conferenced before Standing Master Joyce Usiskin on Wednesday, January 17, 2001, all counsel listed on Exhibit "A" appearing;

IT IS on this _____ day of January 2001

RECOMMENDED that:

1. All provisions of Case Management Recommendation #1 (CMR #1) dated April 10, 2000 In Re Tobacco Litigation are incorporated herein and remain in full force and effect.
2. Plaintiff shall serve defense counsel with all preliminary disclosure forms by January 31, 2001.
3. By October 31, 2001 all fact discovery is to be completed, including merits interrogatories, document production, depositions of all fact witnesses, and any motions before the Standing Master to cure any deficiencies in the paper discovery.
4. By November 30, 2001 plaintiff shall identify all expert witnesses who will testify on behalf of plaintiff at the trial of this matter. Such disclosure shall be in accordance with para. #1, Section F of CMR #1.
5. By December 31, 2001 all defendants shall identify their expert witnesses in accordance with the provision of para. 1, Section F of CMR #1.
6. Depositions of plaintiff's experts shall be completed by February 15, 2002 and depositions of defendant's experts by March 30, 2002.

Joyce Usiskin, Standing Master