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

WALTER & CATHERINE GROSSI,
Plaintiff(s),
vs.
AO SMITH CORPORATION, et al
Defendant(s).

Docket No: **L-2533-16 (AS)**

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 *July 20, 2016:*

FIRM	ATTORNEY	CLIENT
Simmons Hanley	Laurence Nassif	Plaintiff(s)
Dickie McCamey	William Smith	NJ Plumbing
Lynch Daskal	Alexander Broche	Gerard Packing
Margolis Edelstein	Justin M. Bettis	John Crane
Maron Marvel	Carolyn Williams	Industrial Holdings Corp.
Mayfield Turner	Adam Fogarty	Carrier
McElroy Deutsch	Brian Sorensen	Burnham
McGivney Kluger	Caitlin Christie	Rarian Suppy; Holland Furnace; Weil McLain
O'Toole Fernandez	Leslie Lombardy	Peerless
Pascarella DiVita	Madelyn Iulo	Trane US, Inc.; Crane Co.
Ricci Tyrrell	Nancy Green	Chicago Bridge & Iron; Toms River Plumbing Supply
Sedgwick LLP	Nicole Nielson-Pachkofsky	CBS
Styliades Mezzanotte	Patricia Lyons	HM Royal
Wilbraham Lawler	Michelle Kirsch	Lennox Industries

IT IS on this **21st** day of **July, 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.

Defense counsel shall notify plaintiff's 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

July 29, 2016 Defendants shall serve answers to standard interrogatories by this date.

August 5, 2016 Plaintiff shall propound supplemental interrogatories and document requests by this date.

September 6, 2016	Defendants shall serve answers to supplemental interrogatories and document requests by this date.
August 5, 2016	Defendants shall propound supplemental interrogatories and document requests by this date.
September 6, 2016	Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
October 14, 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.
October 14, 2016	Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

October 21, 2016	Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

October 21, 2016	Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.
November 4, 2016	Summary judgment motions shall be filed no later than this date.
December 2, 2016	Last return date for summary judgment motions.

MEDICAL DEFENSE

December 2, 2016	Plaintiff shall serve medical expert reports by this date.
December 2, 2016	Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.
January 27, 2017	Defendants shall identify its medical experts and serve medical 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

December 2, 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.
January 27, 2017	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

February 15, 2017	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

January 18, 2017 @ 10:00am	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.
10 business days prior to trial	Pretrial Information Exchange Form due.
March 6, 2017	**Trial-Ready** 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