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

MICHAEL & VICTORIA JUNG,
Plaintiff(s),
vs.
BEAZER EAST INC., et al
Defendant(s).

Docket No: **L-6918-15 (AS)**

Civil Action

CASE MANAGEMENT ORDER IV

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on *September 16, 2016:*

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph J. Mandia	Plaintiff(s)
Caruso Picini	Stacey Lee Trien	Union Carbide
Gibbons	Mark R. Galdieri	Honeywell International Inc.
Kent McBride	Robert S. Florke	Ferro
LeClair Ryan	Michael Goldklang	Ford
Lewis Brisbois	Steven T. Corbin	Henkel
McCarter & English	John C. Garde	Scotts Co.
Montgomery Chapin	John Fetten	JH France
Salmon Ricchezza	John Dugan	Beazer East Inc.; Universal Refractories
Sedgwick LLP	Mark Wasef	Borg Warner; United Steel Corp.

IT IS on this **20th** day of **September, 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

October 17, 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 17, 2016 — Depositions of corporate representatives, including U.S. Steel, shall be completed by this date.

EARLY SETTLEMENT

October 31, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

DISPOSITIVE MOTION PRACTICE

December 16, 2016 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

January 6, 2017 Dispositive motions shall be filed no later than this date.

February 3, 2017 Last return date for dispositive motions.

MEDICAL DEFENSE

November 30, 2016 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

October 17, 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.

November 23, 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.

ECONOMIST EXPERT REPORTS

October 17, 2016 Plaintiff shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

November 23, 2016 Defendants shall identify its expert economists and serve expert economist report(s), if any, by this date or waive any opportunity to rely on economic expert testimony.

EXPERT DEPOSITIONS

December 16, 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

December 7, 2016 @ 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.

January 4, 2017	The settlement conference previously scheduled on this date is **cancelled**.
January 31, 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.
February 21, 2017	Pretrial Information Exchange Form due.
February 27, 2017	**Trial-Ready** Date. *(The January 30, 2017 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