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

ESTATE of ROBERT ZAWACKI,
Plaintiff(s),
vs.
AUGUST ARACE & SONS, et al
Defendant(s).

Docket No: **L-4564-14 (AS)**

Civil Action

CASE MANAGEMENT ORDER VI

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

FIRM	ATTORNEY	CLIENT
Wilentz Goldman & Spitzer	Philip Tortoreti	Plaintiff(s)
Bucca & Campisano	Benjamin Bucca	IMO
Connell Foley	Richard Jagen	August Arace; The Frank A. McBride Co.
Hack Piro	Robert Alencewicz	Johansen
Hardin Kundla	Nicea D'Annunzio	Calon Insulation
Hoagland Longo	Jessica Saad	Industrial Welding
Kent McBride	Kevin Hoffman	Binsky; TJ McGlone; Mooney
Landman Corsi	Charles Mondora	Sequoia Ventures, Inc.
Langsam Stevens	David McHale	Zy-Tech Global
Margolis Edelstein	Justin M. Bettis	Woolsulate; Central Jersey Supply; URS Energy & Construction
Marks O'Neill	Sebastian Goldstein	Nicholas Schwalje Inc.
McGivney Kluger	Joel Clark	Raritan Supply; Bergen Ind.; Madsen & Howell
McGivney Kluger	Caitlin Christie	Fairbanks; Flowserve
Morgan Lewis	Christopher Iannicelli	Goulds Pumps; ITT Corp.
Pascarella DiVita	Lisa Pascarella	Crane Co.; Ingersoll Rand
Tierney Law Office	Michael Murphy	Elizabeth Industrial Supply
Weiner Lesniak	Edward Seaver	Merck

IT IS on this 17th day of **June, 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

August 31, 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.

August 31, 2016 — Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

September 9, 2016 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

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

September 30, 2016 Summary judgment motions shall be filed no later than this date.

October 28, 2016 Last return date for summary judgment motions.

MEDICAL DEFENSE

November 30, 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

November 30, 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 13, 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

November 30, 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.

January 13, 2017 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

January 31, 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

September 21, 2016 The settlement conference previously scheduled on this date is **cancelled**.

October 12, 2016 @ 9:30am	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 2, 2017 @ 9:30am	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 *(Tuesday)*	Trial Date. *(The October 17, 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