

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

Docket No: **L-5418-12 (AS)**

Civil Action

CASE MANAGEMENT ORDER V

MICHAEL C. ARGENTO, <i>Plaintiff(s),</i> vs. CHARLES B. CHRYSTAL CO., INC., et al <i>Defendant(s).</i>
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This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on January 27, 2014:

FIRM	ATTORNEY	CLIENT
Levy Phillips & Konigsberg	Leah Kagan Joseph J. Mandia	Plaintiff(s)
Brown & Connery	Stephen J. DeFeo	Lorillard Tobacco Co.; Hollingsworth & Vose Co.
Hoagland Longo	Nora Grimbergen	Whittaker Clark & Daniels
McCarter & English	John Garde	The Scotts Company

IT IS on this 6th day of **February, 2014** 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

March 31, 2014 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.

March 31, 2014 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

June 20, 2014 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

May 9, 2014 Summary judgment motions shall be filed no later than this date.

June 6, 2014 Last return date for summary judgment motions.

MEDICAL DEFENSE

March 3, 2014 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

EXPERT DEPOSITIONS

July 15, 2014 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

July 23, 2014 @ 1:30pm 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.

August 11, 2014 Trial Date.

Plaintiff's counsel shall serve a copy of this Order upon any additional counsel immediately upon receipt.

/s/ Vincent Le Blon
VINCENT Le BLON, J.S.C.

cc: Clerk, Mass Tort
 Brody Deposition Services
 Priority One