

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

Docket No: **L-5394-11 (AS)**

Civil Action

CASE MANAGEMENT ORDER II

|   |
|---|
| EDWARD DEAN,<br><br><i>Plaintiff(s),</i><br><br>vs.<br><br>WINFIELD MUTUAL HOUSING CORP., et al<br><br><i>Defendant(s).</i> |
|---|

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on February 20, 2014:

| FIRM             | ATTORNEY      | CLIENT  |
|------------------|---------------|---|
| Rappa Law Office | Leonard Rappa | Plaintiff(s)  |
| Hoagland Longo   | Jacob Grouser | Winfield Mutual Housing Authority; Fred Vitica; Denise Baldarama; Robert Peryea |
| McGivney Kluger  | Joel Clark    | D&S Abatement Inc.  |

IT IS on this 25<sup>th</sup> 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 Defendants shall serve answers to supplemental interrogatories and document requests by this date.
- April 30, 2014 Plaintiff depositions shall be concluded by this date.
- June 30, 2014 Fact discovery, including depositions, shall be completed by this date.
- June 30, 2014 Depositions of corporate representatives shall be completed by this date.

**EARLY SETTLEMENT**

- April 15, 2014 Settlement demands shall be served on all counsel and the Special Master by this date.

**SETTLEMENT CONFERENCE**

- May 15, 2014 @ 1:30pm** Settlement Conference scheduled before Special Master (to be followed by a Case Management Conference).

**SUMMARY JUDGMENT MOTION PRACTICE**

January 23, 2015          Summary judgment motions shall be filed no later than this date.

February 20, 2015        Last return date for summary judgment motions.

**MEDICAL DEFENSE**

August 29, 2014          Plaintiff shall serve medical expert reports by this date.

September 30, 2014      The defense medical examination of plaintiff(s) shall be completed by this date.

November 28, 2014       Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

**LIABILITY EXPERT REPORTS**

August 29, 2014          Plaintiff shall identify its liability experts and serve liability expert reports by this date.

October 31, 2014         Defendants shall identify its liability experts and serve liability expert reports by this date.

**EXPERT DEPOSITIONS**

March 31, 2015            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**

To be scheduled            Settlement conference.

April 20, 2015             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