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

ARNOLD KOECHER & MARY BELL,
Plaintiff(s),

vs.

3M COMPANY, et al
Defendant(s).

Docket No: **L-7390-15 (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 *March 29, 2016:*

FIRM	ATTORNEY	CLIENT
Cohen Placitella & Roth	Dennis Geier	Plaintiff(s)
Caruso Smith	Alexandra Caruso	CertainTeed; Union Carbide
Connell Foley	Richard Jaen	August Arace; Frank McBride Co.; Superior Welding Supply Co.
Delany McBride	Sara Labashosky	Ductmate
Fox Rothschild	Jacqueline M. Carolan	Merck
Garrity Graham	Anthony Marino	Damon G. Douglas
Gibbons	Christopher P. DePhillips	AT&T Corp.; Alcatel-Lucent
Hawkins Parnell	Roy Viola	CNA Holdings / Celanese
Lavin O'Neil	Catherine Brunermer	3M Company
Lavin O'Neil	LaWanda D. White	Verizon New Jersey Inc.
Lynch Daskal	Alexandra Ober	Georgia Pacific
Margolis Edelstein	Dawn Dezii	Central Jersey Supply; Passaic Metal Products
Marks O'Neill	Paul Smyth	Superior Boiler Works; Honeywell
Maron Marvel	Carolyn Williams	Industrial Holdings Corp.
Marshall Dennehey	Paul Johnson	Beach Electric
McElroy Deutsch	John (Jack) McGuire	Pfizer; Pabst
McGivney Kluger	Marc J. Wisel	Duro Dyne; DAP; Raritan Supply
McGivney Kluger	Pooja Patel	Federated Dept. Stores; Franklin & Sons; Armistead
O'Toole Fernandez	Leslie Lombardy	Avocet
Porzio Bromberg	Michelle Burke	Cytec Industries Inc.
Tierney Law Offices	Mark Turner	Elizabeth Industrial Supply
Wilbraham Lawler	Tristin Fabro	Karnak

IT IS on this **4th** day of **April, 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

April 15, 2016	Defendants shall serve answers to standard interrogatories by this date.
April 29, 2016	Plaintiff shall propound supplemental interrogatories and document requests by this date.
May 31, 2016	Defendants shall serve answers to supplemental interrogatories and document requests by this date.
April 29, 2016	Defendants shall propound supplemental interrogatories and document requests by this date.
May 31, 2016	Plaintiff shall serve answers to supplemental interrogatories and document requests by this date.
July 29, 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

June 30, 2016	Plaintiff shall serve medical expert reports by this date.
June 30, 2016	Upon request by defense counsel, plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.
November 4, 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

September 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.

November 4, 2016 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

September 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.

November 4, 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

November 30, 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 6, 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.

10 business days prior to trial Pretrial Information Exchange Form due.

January 9, 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