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

JOACHIM SCHWIEDOP, *Plaintiff(s),* vs. 3M COMPANY, et al *Defendant(s).*	Docket No: **L-1125-14 (AS)** Civil Action CASE MANAGEMENT ORDER VIII

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

FIRM	ATTORNEY	CLIENT
Levy Konigsberg	Joseph J. Mandia	Plaintiff(s)
Eckert Seamans	Stephanie Coleman	AO Smith
Gibbons PC	Mark R.Galdieri	Hoffman-LaRoche; Roche Laboratories
Gibbons PC	Christopher P. DePhillips	Alcatel-Lucent; AT&T
Landman Corsi	Jorkeell Echeverria	The Lincoln Electric Co.
Margolis Edelstein	Justin M. Bettis	John Crane; Verona
McElroy Deutsch	Charles J. Benjamin, Jr.	Exxon; Burnham
McGivney Kluger	Joel Clark	Weil McLain; Durametallic; DAP; Duriron
Pascarella DiVita	Bradley E. Bishop	Rheem Mfg.

IT IS on this **17th** day of **May, 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 16, 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 16, 2016 — Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

October 28, 2016 — Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

September 2, 2016 Plaintiff's counsel shall advise, in writing, of intent not to oppose motions by this date.

September 16, 2016 Summary judgment motions shall be filed no later than this date.

October 14, 2016 Last return date for summary judgment motions.

MEDICAL DEFENSE

August 16, 2016 Plaintiff shall serve medical expert reports by this date.

November 18, 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

August 16, 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 18, 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

August 16, 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 18, 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 9, 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

August 26, 2016 The settlement conference previously scheduled on this date is **cancelled**.

December 15, 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 9, 2017 Trial Date. *(The September 26 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