FILED

JAN 14 2014

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SUPERIOR COURT OF NEW JERSEY

IN RE: BRISTOL-MYERS SQUIBB ENVIRONMENTAL CONTAMINATION LITIGATION	LAW DIVISION: ATLANTIC COUNTY MASTER DOCKET NO. ATL-l-3517-08 MT CASE NO. 281 **CASE MANAGEMENT ORDER NO. 16**

THIS MATTER having come before the Court for a Case Management Conference on Wednesday, December 18, 2013, and counsel for plaintiffs and counsel for defendant Bristol-Myers Squibb Company ("BMS") having participated and having met-and-conferred since that conference, and for good cause shown,

IT IS on this 14 day of January, 2014, ORDERED that, except to the extent inconsistent with the terms of the within Case Management Order ("CMO"), all prior CMOs

remain in full force and effect, and it is further ORDERED that the revised Group One bellwether schedule shall be as follows:

1. Plaintiffs shall serve final, revised expert reports by January 2, 2014.

2. BMS will complete its disclosure of expert reports no later than January 27, 2014. However, BMS shall use its best efforts to produce those expert reports that it can by January 20, 2014.

3. The parties shall complete *de bene esse* depositions by February 28, 2014.

4. The parties shall complete expert depositions by March 14, 2014.

5. The selection of which bellwether to be tried will be made by the case management conference scheduled for March 26, 2014.

6. The parties shall brief *Kemp* motions challenging experts as well as motions for summary judgment in accordance with the following schedule:

(a) Moving papers to be served by March 25, 2014;
(b) Opposition papers to be served by April 15, 2014; and
(c) Reply papers to be served by April 25, 2014.

7. The Court will hold a hearing on the *Kemp* a nd summary judgment motions in conjunction with the case management conference scheduled for May 13, 2014.

8. The parties shall exchange witness and exhibit lists in accordance with the following schedule:

(a) Plaintiffs will serve their lists by March 20, 2014;
(b) BMS will serve its lists by April 3, 2014; and
(c) The parties will submit final lists to the Court by April 10, 2014.

9. The parties shall exchange deposition designations in accordance with the following schedule:

(a) Plaintiffs will serve their designations by March 20, 2014; and
(b) BMS will serve its designations by April 3, 2014.

10. The parties shall brief their respective motions *in limine* in accordance with the following schedule:

(a) The parties will file their moving papers by April 11, 2014;
(b) The parties will file opposition papers by May 2, 2014; and
(c) The parties will file reply papers by May 16, 2014.

11. The Group One bellwether trial shall commence on August 18, 2014.

IT IS FURTHER ORDERED that the revised Group Two bellwether schedule shall be as follows:

12. The selection of the Group Two bellwether pool will be made by the case management conference to be held on March 26, 2014.

13. The parties shall exchange final written discovery demands with regard to the Group Two bellwethers in accordance with the following schedule:

(a) BMS will serve its written discovery demands by April 15, 2014; and
(b) Plaintiffs will answer those discovery demands no later than May 30, 2014.

14. The parties shall complete all remaining general causation fact discovery on the Group Two bellwethers as well as in the multicounty litigation by August 29, 2014.

15. Plaintiffs shall their serve expert reports no later than October 31, 2014.

16. BMS shall serve its answering expert reports no later than December 31, 2014.

17. The parties shall complete depositions of experts by February 27, 2015.

18. The selection of the Group Two bellwether action to be tried shall be made by March 2ND, 2015

IT IS FURTHER ORDERED that plaintiffs' counsel will serve a copy of this Order on all counsel of record within five (5) days of its receipt.

Honorable Carol E. Higbee, P.J. Cv.