

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

**Docket No: L-7275-12 (AS)**

**Civil Action**

**CASE MANAGEMENT ORDER II**

JAMES & LILLIAN COLLAS,  <i>Plaintiff(s),</i>  vs.  3M COMPANY, et al  <i>Defendant(s).</i>
---

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on January 29, 2014:

<b>FIRM</b>	<b>ATTORNEY</b>	<b>CLIENT</b>
Cohen Placitella & Roth	William L. Kuzmin	Plaintiff(s)
Breuninger & Fellman	Kathleen Ramalho	National Automotive Parts Assoc.
Caruso Smith	Lisa Massimi	CertainTeed; Union Carbide
Eckert Seamans	Thomas Oakes	Navistar
Gibbons PC	Ethan Stein	Honeywell International, Inc.
Hoagland Longo	Mark Wasef	Borg Warner
LeClair Ryan	Michael Goldklang	Ford Motor
Marks O'Neill	Dennis Schmieder	Caterpillar, Inc.
Marshall Dennehey	Paul Johnson	Pep Boys
McElroy Deutsch	Michelle Hydrusko	Lipe
Rawle & Henderson	Meredith Mack	Mack Trucks; Hennessy

IT IS on this 7<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**

April 30, 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.

April 30, 2014      Depositions of corporate representatives shall be completed by this date.

### **EARLY SETTLEMENT**

May 9, 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 31, 2014 Plaintiff shall serve additional medical expert reports by this date.

March 31, 2014 Plaintiff is to arrange for the transfer of pathology specimens and x-rays, if any, by this date.

June 30, 2014 Defendants shall identify its medical experts and serve medical expert reports, if any, by this date.

### **LIABILITY EXPERT REPORTS**

May 30, 2014 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.

June 30, 2014 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**

May 30, 2014 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.

June 30, 2014 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**

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 17, 2014 @ 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.

July 28, 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