

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

DOROTHY & JOHN J. REDMOND, <p style="text-align: center;"><i>Plaintiff(s),</i></p> <p style="text-align: center;">vs.</p> 3M COMPANY, et al <p style="text-align: center;"><i>Defendant(s).</i></p>	
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Docket No: L-616-14 (AS)

Civil Action

CASE MANAGEMENT ORDER III

This matter coming in for a Case Management Conference before Special Master Agatha N. Dzikiewicz and the following parties on March 24, 2015:

FIRM	ATTORNEY	CLIENT
Seeger Weiss	Nathaniel Falda	Plaintiff(s)
Baginski Mezzanotte	Mark Macdonald	HM Royal; Viking Pump
Budd Lerner	Dan Feuerstein	Goodyear Tire & Rubber
Caruso Smith	Lisa Massimi	Union Carbide; CertainTeed
Connell Foley	Richard Jagen	August Arace
Hardin Kundla	Nicea D'Annunzio	Calon Insulation; Strahman Valves
Hoagland Longo	Jason R. Gosnell	Goulds Pumps; Johnston Controls; EMCO Fittings
Kelley Jasons	Joseph Vasalotti	Nibco; Ricwil
Kent McBride	David Rutkowski	Binsky; Marsam
Lavin O'Neil	Catherine Brunermer	3M Company
Lynch Daskal	Jessical Lau	Georgia Pacific
Margolis Edelstein	Ryan Buchanan	Columbia Boiler Co.; Central Jersey Supply; John Crane; United Engineers; Woolsulate; Ideal Supply
Marks O'Neill	Paul Smyth	GPU Energy; Honeywell; Nicholas Schwalje
Maron Marvel	Carolyn Williams	Industrial Holdings Corp.
Marshall Dennehey	Rachal Von Rhie	Kaiser Gypsum; Riley Power
Mayfield Turner	Zoe C. Elfenbein	Carrier Corp.
McCarter & English	John C. Garde	Fisher Controls
McGivney Kluger	Thomas McNulty	Taco; Weil McLain; Zurn; Raritan
O'Brien Firm	Brian P. Lawlor	American Industrial Supply
Pascarella DiVita	Brad Bishop	Ingersoll Rand; Trane US Inc.; Crane Co.
Pepper Hamilton	Christopher Soper	Allied Chemical; Honeywell Int'l as successor to Wilpette Cake Oven
Pepper Hamilton	Nicholas Kouletsis	Bristol Myers Squibb
Reilly Janiczek	Edward Henry	ITT; Aurora; Cleaver Brooks
Ricci Tyrell	Nancy Green	Fluidics
Sedgwick LLP	Bridget Polloway	Flowserve d/b/a Wilson-Snyder Pumps; Foster Wheeler; CBS/Westinghouse; General Electric
Segal McCambridge	Michael F. Gorman	BW/IP, Inc.
Swain & Westreich	Kenneth Westreich	Buist

Tierney Law	Michael O'Neill	AJ Friedman Supply Co.
Vasios Kelly	Linda Fulop-Slaughter	Armstrong Int'l, Inc.
Wilbraham Lawler	Elizabeth deBerardinis	PSE&G

IT IS on this 25th day of March, 2015 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 24, 2015 Defendants shall serve answers to standard interrogatories by this date.
- June 30, 2015 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.
- July 30, 2015 Depositions of corporate representatives shall be completed by this date.

EARLY SETTLEMENT

- August 7, 2015 Settlement demands shall be served on all counsel and the Special Master by this date.

SUMMARY JUDGMENT MOTION PRACTICE

- August 21, 2015 Summary judgment motions shall be filed no later than this date.
- September 18, 2015 Last return date for summary judgment motions.

MEDICAL DEFENSE

- July 30, 2015 Plaintiff shall serve supplemental medical expert reports, if any, by this date.
- October 30, 2015 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

- September 30, 2015 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.
- October 30, 2015 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, 2015 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.
- October 30, 2015 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 20, 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

- May 12, 2015 The settlement conference previously scheduled on this date is **cancelled**.
- November 5, 2015 @ 1:30pm 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.
- December 7, 2015 Trial Date. (*The June 15, 2015 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
Brody Deposition Services
Priority One