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March 29, 2008

Honorable Philip S. Carchman, P.J.A.D.
Acting Administrative Director of the Courts
P.O. Box 037
Trenton, NJ 08625-0037

Re: Porch/Ritchie v. Foster Wheeler Corporation, et al.
Docket No. CAM-L-5053-05

Re: Eorio v. Garlock Sealing Technologies, et al.,
Docket No. CAM-L-10132-05

Re: DeFrancisco v. Rapid American Corp., et al.,
Docket No. CAM-L-4862-07

Dear Judge Carchman:

Please accept this letter as my response on behalf of the above plaintiffs to the "Application to Designate Asbestos Litigation as a Mass Tort for Centralized Management"

I have no opposition to the designation with the exceptions noted below. In general, I believe that centralized management of asbestos litigation in Middlesex County will benefit both the plaintiff and defense bar because it will result in greater efficiency and consistency of both procedural and substantive rulings. However, the paramount concern must be to insure that

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justice is not only dispensed efficiently and consistently, but that it is also dispensed expeditiously.

With that paramount consideration in mind, I object to two cases in which I represent the plaintiffs (*Ritchie* and *Eorio*) being centralized in Middlesex County because they are both set for trial in June 2008, and "transfer" to Middlesex County will undoubtedly delay the trials. I do not believe it is fair to these plaintiffs to further delay their day in court.

The trial dates in the *Ritchie* and *Eorio* cases are June 10, 2008, and June 24, 2008, respectively. With the exception of limited, albeit, significant discovery, that I am waiting to receive from certain defendants, both cases are otherwise ready for trial. For that reason, I do not believe it is appropriate for those two cases to be "transferred" from Camden County because "transfer" would undoubtedly delay the trials.

With regard to the *DeFrancisco* case, I have no objection to that matter being transferred to Middlesex County since it was not filed until September 2007, and it does not currently have a trial date.

Very truly yours,



Hal Pitkow

cc: Michelle V. Perone, Chief, Civil Courts Program
All Counsel of Record