

**STATE OF RHODE ISLAND
PROVIDENCE, SC.**

SUPERIOR COURT

STATE OF RHODE ISLAND; :
PETER F. NERONHA, in his :
capacity as Attorney General of the :
STATE OF RHODE ISLAND; and :
DR. UTPALA BANDY, :
in her capacity as Interim Director, :
RHODE ISLAND DEPARTMENT :
OF HEALTH :

Plaintiffs, :

v. :

C.A. No. PC-2023-02652

PIONEER INVESTMENTS, L.L.C.; :
ANURAG SUREKA :

Defendants. :

**THE STATE OF RHODE ISLAND’S OBJECTION AND REPLY TO DEFENDANTS’,
PIONEER INVESTMENTS, LLC AND ANURAG SUREKA’S, MOTION FOR A MORE
DEFINITE STATEMENT**

NOW COME the State of Rhode Island, Peter F. Neronha in his capacity as Attorney General for the State of Rhode Island and Dr. Utpala Bandy in her capacity as Interim Director of the Rhode Island Department of Health (hereinafter collectively referred to as the “State”), by and through undersigned counsel and hereby objects and replies to the Defendants’, Pioneer Investments, L.L.C. and Anurag Sureka’s, Motion for a More Definite Statement. The State submits the accompanying Memorandum of Law in support thereof.

Respectfully submitted,

STATE OF RHODE ISLAND;

**PETER F. NERONHA
ATTORNEY GENERAL;**

**DR. UTPALA BANDY
DEPARTMENT OF HEALTH**

By Their Attorneys:

**PETER F. NERONHA
ATTORNEY GENERAL**

/s/ Keith Hoffmann

/s/ Riley O'Brien

KEITH HOFFMANN (Bar No. 9874)

RILEY O'BRIEN (Bar No. 10575)

OFFICE OF THE ATTORNEY GENERAL

150 South Main Street

Providence, Rhode Island 02903

Tel: (401) 274-4400

Fax: (401) 222-2995

khoffmann@riag.ri.gov

robrien@riag.ri.gov

CERTIFICATION

I hereby certify that, on the 11th day of August, 2023, I filed and served this document through the electronic filing system on the attorneys of record. The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/Keith Hoffmann