



State of Rhode Island Judiciary

Miscellaneous Petition for Admission Pro Hac Vice Supreme Court Article II, Rule 9(a)

Case Number
PC-2024-04526

- Supreme Court
 Superior Court
 Family Court
 District Court
 Workers' Compensation Court
 Rhode Island Traffic Tribunal
 County - Providence/Bristol
 Washington
 Kent
 Newport
 6th Division
 4th Division
 3rd Division
 2nd Division

Plaintiff or Petitioner
State of Rhode Island

v.

Defendant or Respondent
Aecom Technical Services, Inc., et. al.

State of Rhode Island _____ hereby requests that Takisha D. Richardson

 Petitioner

be admitted pro hac vice in the above case or agency proceeding as counsel with local associate counsel identified below, on the following grounds (*please check appropriate grounds and provide specifics as noted*):

The case or agency proceeding involves the following complex areas of the law, in which pro hac vice counsel concentrates: (*The Petitioner shall specify the area of law at issue and the basis upon which the Petitioner certifies that the pro hac vice counsel concentrates in this area, including past cases in this or any other jurisdiction. Detailed information about past cases, including docket sheets, must be provided. Attach additional pages if needed.*)

This is a case involving complex litigation in which over one dozen business entities are alleged to have failed in their respective duties to the State of Rhode Island stemming from negligence and breach of contract with regard to the Washington Bridge North No. 700. Ms. Richardson has practiced law since 2007, has nearly two decades of experience, and has tried more than 100 jury and non-jury trials. She has been involved in numerous complex litigation matters in various jurisdictions involving complex issues and against multiple defendants. See attached for description of examples.

Pro hac vice counsel's long-standing representation of the client: (*The Petitioner shall specify all facts to support the long-standing attorney-client relationship at issue, including dates and extent of the representation. Detailed*

information about past cases, including docket sheets, must be provided. Attach additional pages if needed.)

The local bar lacks experience in the field involved: *(The Petitioner shall specify all facts to support the claim that the local bar lacks the expertise necessary to competently handle this case. Attach additional pages if needed.)*

The case or agency proceeding involves complex legal questions under the law of a foreign jurisdiction with which pro hac vice counsel is familiar: *(The Petitioner shall specify all facts to support the claim that the case or agency proceeding involves the existence of legal questions involving the law of a foreign jurisdiction with which pro hac vice counsel is familiar and the basis for that familiarity. Detailed information about past cases, including docket sheets, must be provided. Attach additional pages if needed.)*

The case or agency proceeding requires extensive discovery in a foreign jurisdiction convenient to pro hac vice counsel: *(The Petitioner shall specify all facts to support the need for extensive discovery proceedings in a foreign jurisdiction with*

which pro hac vice counsel is familiar. Detailed information about past cases, including docket sheets, must be provided. Attach additional pages if needed.)

This is a criminal case and the pro hac vice counsel is the Defendant's counsel of choice.

Other: *(The Petitioner shall specify all other facts to support a finding of good cause. Attach additional pages if needed.)*

I hereby represent that I am a member in good standing of the bar of the State of Rhode Island and that I am actively engaged in the practice of law out of an office located in this state.

/s/ Michael P. Robinson _____ Signature	Rhode Island Bar Number 6306
	Date: 11/1/2024
Attorney for: State of Rhode Island _____ /s/ Takisha D. Richardson _____ Signature Pro Hac Vice Counsel/Applicant	

Certificate of Service

I, Michael P. Robinson _____, hereby certify that a true copy of this Miscellaneous Petition for Admission Pro Hac Vice with accompanying attorney and client certifications were sent postage prepaid to See Attached Exhibit A _____, on this 1st day of November _____, 2024.

Michael P. Robinson

Continuation:

The case or agency proceeding involves the following complex areas of the law, in which pro hac vice counsel concentrates:

Jan Burgess, et al vs. United States of America, USDC, Eastern District of MI, 4:17-cv-11218 (class action litigation).

EXHIBIT A

Notice has been sent to all those listed on the Court's Judiciary Portal for PC-2024-4526, and also to those listed below:

<u>DEFENDANT/ PARTY</u>	<u>REPRESENTED BY ATTORNEY</u>	<u>E-MAIL</u>
AECOM Technical Services, Inc.	Courtney A. Richards, Esq. Cozen O'Connor	crichards@cozen.com
	Michael Filbin, Esq. Cozen O'Connor	mfilbin@cozen.com
	Wendy Venoit, Esq. Cozen O'Connor	wvenoit@cozen.com
	Lawrence Prosen, Esq. Cozen O'Connor	lprosen@cozen.com
	Amanda R. Prosek, Esq. Lamontagne, Spaulding & Hayes, LLP	aprosek@lshattorneys.com
	Melanie DeMattia, Esq. Cozen O'Conner	mdemattia@cozen.com
AETNA Bridge Company	Jackson C. Parmenter, Esq. Kelly, Souza & Parmenter, PC	jparmenter@ksplawpc.com

	Sean Klammer, Esq. KSPR Law, PC	sklammer@ksprlaw.com
	Michael A. Kelly, Esq. KSPR Law, PC	mkelly@ksprlaw.com
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	Paul S. Callaghan, Esq. Higgins, Cavanagh & Cooney, LLP	pcallaghan@hcc-law.com
	Luna Roque Heald Law, LTD	office@healdlaw.net
Barletta Heavy Division, Inc.	Christopher D. Mellado, Esq. Foley & Lardner LLP	chris.mellado@foley.com

	Jeffrey B. Blease, Esq. Foley & Lardner LLP	jblease@foley.com
	Jeffrey B. Pine, Esq. Lynch & Pine	jpine@lynchpine.com
Barletta/AETNA I- 195 Washington Bridge North Phase 2 JV	Christopher D. Mellado, Esq. Foley & Lardner LLP	chris.mellado@foley.com
	Jeffrey B. Blease, Esq. Foley & Lardner LLP	jblease@foley.com
	Jeffrey B. Pine, Esq. Lynch & Pine	jpine@lynchpine.com
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Commonwealth Engineers & Consultants, Inc.	Susan M. Silva, Esq. Peabody & Arnold LLP	ssilva@peabodyarnold.com

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	Samuel E. Cote, Esq. Sloane & Walsh, LLP	scote@sloanewalsh.com
Steere Engineering, Inc.	Warren D. Hutchison, Esq. Freeman Mathis & Gary, LLP	whutchison@fmglaw.com
	Warren D. Hutchison, Esq. Freeman Mathis & Gary, LLP	

TranSystems Corporation	Mark P. Dolan, Esq. Rice Dolan & Kershaw	mdolan@ricedolan.com
Vanasse Hangen Brustlin, Inc.	Brian C. Newberry, Esq. Lewis Brisbois	brian.newberry@lewisbrisbois.com
	Amanda E. Mathieu, Esq. Lewis Brisbois	amanda.mathieu@lewisbrisbois.com



State of Rhode Island Judiciary

Attorney Certification for Admission Pro Hac Vice Supreme Court Article II, Rule 9(a)

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I certify that I am a member in good standing of the bar of the following state(s) without any restriction on my eligibility to practice, and that I understand my obligation to notify this Court immediately of any change to my status in this respect. *(Attach additional pages if needed.)*

Jurisdiction	Dates of Admission	Bar Number	Current Status
Florida	September 18, 2007	0042007	Active
USDC - FL. Middle	March 14, 2018	0042007	Active
USDC - FL. Southern	March 1, 2018	0042007	Active
USDC - FL. Northern	March 16, 2018	0042007	Active

I certify that I am not currently disbarred or suspended in any court.

Below is a complete list of all matters in which I have been sanctioned or disciplined. *(Attach additional pages if needed.)*

Jurisdiction/Authority	Caption/Case Number	Nature of Allegations	Action Taken
None			

The following is a complete and accurate list of *all* proceedings in which I have applied for pro hac vice admission pursuant to Article II, Rule 9(a) of the Supreme Court Rules on the Admission to Practice Law. *(Attach additional pages if*

needed. Attach docket sheets for all cases listed below and copies of all court orders pertaining to your admission pro hac vice.)

Court Filed	Case Name/Number	Date Filed	Admission Granted?
None			

I have read and certify that the Miscellaneous Petition for Admission Pro Hac Vice filed by local counsel with this certification contains true and accurate information regarding my experience which provides the basis for my admission pro hac vice.

I have read, acknowledge, and agree to observe and to be bound by the local rules and orders of this Court, including the Rules of Professional Conduct of the Rhode Island Supreme Court, as the standard of conduct for all attorneys appearing before the Court.

I acknowledge that if specially admitted to appear in the above-entitled matter that I will be subject to the disciplinary procedures of the Rhode Island Supreme Court. I hereby authorize the disciplinary authorities of the bar of the State(s) listed above to release any information concerning my practice in said State(s) pursuant to the request of the Disciplinary Counsel of the Rhode Island Supreme Court.

For purposes of this case I have associated with local associate counsel identified below, and have read, acknowledge, and will observe the requirements of this Court respecting the participation of local associate counsel, recognizing that failure to do so may result in my being disqualified, either upon the Court's motion or motion of other parties in the case.

/s/ Takisha D. Richardson Signature Pro Hac Vice Counsel/Applicant	Date 11/1/2024
Firm Name and Address: Cohen Milstein Sellers & Toll, 11780 US Highway One #500, Palm Beach Gardens, FL 33408	

Certification of Local Associate Counsel

I certify that I have read and join the foregoing Certification and acknowledge and agree to observe the requirements of this Court as related to the participation and responsibilities of local associate counsel.

/s/ Michael P. Robinson Signature	Rhode Island Bar Number 6306
	Date: 11/1/2024



State of Rhode Island Judiciary

Client Certification

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I, Adi Goldstein, on behalf of the Office of Attorney General, certify that:

1. I am the Plaintiff/Defendant or an authorized representative of a corporate or business entity which is the Plaintiff/Defendant in this case;

2. I am aware that Attorney Takisha D. Richardson is not a member of the Rhode Island bar, but that Attorney Takisha D. Richardson has applied for permission to appear in this case on my behalf;

3. I am also aware that, if Attorney Takisha D. Richardson is permitted to appear in this case, I will also be required to engage a co-counsel and pay for the services of a attorney who is a member of the Rhode Island bar;

4. I am also aware that the Rhode Island attorney engaged must be fully prepared to assume complete responsibility for the case at any time, and may be required to conduct the trial, hearing, or appeal in this case on my behalf (or on behalf of the corporate or business entity);

5. Having been advised of the matters set forth above, I support the request of Attorney Takisha D. Richardson to be permitted to appear in this case on my behalf (or on behalf of the corporate or business entity), in accordance with the rules of this Court and of the Supreme Court of the State of Rhode Island.

Christine P. Mellino
Witness

Adi Goldstein
Client Name

November 1, 2024
Date

Adi Goldstein
Client Signature

ENTER:

PER ORDER:

Justice Brian P. Stern

Clerk Dated

Submitted by:

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Michael P. Robinson

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