



# 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  
 6<sup>th</sup> Division  
 4th Division  
 3<sup>rd</sup> Division  
 2<sup>nd</sup> 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 Theodore J. Leopold \_\_\_\_\_  
 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. Mr. Leopold has practiced law since 1987, has almost four decades of experience, and has been involved in handling numerous complex litigation matters in various jurisdictions encompassing similar complex issues, involving highly technical engineering issues, and involving a similar significant number of defendants. Please see attached pg. 4 for 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/ Theodore J. Leopold _____ 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:

Examples include: In re Flint Water Cases, USDC Eastern District of Michigan, 5:16-cv-10444 (class action and mass action matter); Brent Nix, et al vs. The Chemours Company FC, LLC, et. al., USDC Eastern District of North Carolina, 7:17-cv-00189-D (class action matter ); and Salud Services, Inc. vs. Caterpillar, Inc.; USDC District of New Jersey, MDL 2540, 14-3734 (class action matter).



## State of Rhode Island Judiciary

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

<b>Case Number</b> PC-2024-04526
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  Rhode Island Traffic Tribunal  
 County -  Providence/Bristol  
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  Kent  
  Newport  
 6<sup>th</sup> Division  
  4th Division  
  3<sup>rd</sup> Division  
  2<sup>nd</sup> Division

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	10/8/1987	705608	Active
District of Columbia	11/3/2014	FL705608	Active
Supreme Court	4/1/1991		Active
USDC-FL - Southern	3/9/1988		Active
USDC -MI - Eastern	1/30/2014		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/ Theodore J. Leopold Signature Pro Hac Vice Counsel/Applicant	Date 10/31/2024
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

**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  
 6<sup>th</sup> Division    4th Division    3<sup>rd</sup> Division    2<sup>nd</sup> Division

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 Theodore J. Leopold is not a member of the Rhode Island bar, but that Attorney Theodore J. Leopold has applied for permission to appear in this case on my behalf;

3. I am also aware that, if Attorney Theodore J. Leopold 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 Theodore J. Leopold 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.

Chris P. Mullins  
Witness

Adi Goldstein  
Client Name

November 1, 2024  
Date

Adi Goldstein  
Client Signature



**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:

<b><u>DEFENDANT/ PARTY</u></b>	<b><u>REPRESENTED BY ATTORNEY</u></b>	<b><u>E-MAIL</u></b>
AECOM Technical Services, Inc.	Courtney A. Richards, Esq. Cozen O'Connor	<a href="mailto:crichards@cozen.com">crichards@cozen.com</a>
	Michael Filbin, Esq. Cozen O'Connor	<a href="mailto:mfilbin@cozen.com">mfilbin@cozen.com</a>
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ENTER:

PER ORDER:

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Justice Brian P. Stern

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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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