

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

STATE OF RHODE ISLAND,)
)
Plaintiff,)
)
v.)
)
AECOM TECHNICAL SERVICES, INC.,)
AETNA BRIDGE COMPANY,)
ARIES SUPPORT SERVICES INC.,)
BARLETTA HEAVY DIVISION, INC.,)
BARLETTA/AETNA I-195 WASHINGTON)
BRIDGE NORTH PHASE 2 JV,)
COLLINS ENGINEERS, INC.,)
COMMONWEALTH ENGINEERS &)
CONSULTANTS, INC.,)
JACOBS ENGINEERING GROUP, INC.,)
MICHAEL BAKER INTERNATIONAL, INC.,)
PRIME AE GROUP, INC.,)
STEERE ENGINEERING, INC.,)
TRANSYSTEMS CORPORATION, and)
VANASSE HANGEN BRUSTLIN, INC.,)
)
Defendants.)

C.A. No. PC-2024-04526

**MOTION OF THE DEFENDANT VANASSE HANGEN BRUSTLIN, INC. TO ADMIT
ATTORNEY AMANDA E. MATHIEU
PRO HAC VICE**

Now comes the Defendant, Vanasse Hangen Brustlin, Inc. (“VHB”), and moves this Honorable Court to admit Attorney Amanda E. Mathieu, *Pro Hac Vice*. As a basis for this Motion, VHB states that Attorney Amanda E. Mathieu is a licensed attorney in Massachusetts, with no disciplinary actions or proceedings pending against her. Attorney Mathieu has extensive experience in complex construction litigation. Complex construction litigation involves a specialized area of law in which *Pro Hac Vice* counsel concentrates. Further, Attorney Mathieu has a long-standing attorney-client relationship with VHB. In further support of its Motion, VHB attaches hereto a Miscellaneous Petition for Admission *Pro Hac Vice* (**Exhibit 1**), Attorney Certification for Admission *Pro Hac Vice* (**Exhibit 2**), and Client Certification (**Exhibit 3**).

Local counsel certifies that he read and affirms the representations made by *Pro Hac Vice* counsel and the client agrees to observe the requirements of this Court as related to the participating and responsibilities of local associate counsel.

WHEREFORE, Defendant, Vanasse Hangen Brustlin, Inc., respectfully asks for an Order allowing Amanda E. Mathieu to be admitted *Pro Hac Vice* and represent the interests of VHB in the above-referenced matter.

Respectfully submitted,
VANASSE HANGEN BRUSTLIN, INC.
By and through Counsel:

/s/ Brian C. Newberry, Esq.

Brian C. Newberry, Esq. (#5542)
LEWIS BRISBOIS BISGAARD & SMITH, LLP
One Citizens Plaza, Suite 1120
Providence, RI 02903
Tel: (401) 406-3309
Fax: (401) 406-3312
brian.newberry@lewisbrisbois.com
Date: October 24, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Odyssey File & Serve System, will be sent electronically to the registered participants as identified on the Case Service Contacts List and/or paper copies will be sent, postage pre-paid, to those indicated as non-registered participants on this 24th day of October, 2024. The document is further available for viewing and/or downloading from the System.

/s/ Brian C. Newberry, Esq.

Brian C. Newberry, Esq.

FOR THE STATE OF RHODE ISLAND:

STATE OF RHODE ISLAND

Sarah W. Rice, Esq. (#10588)
Stephen N. Provazza, Esq. (#10435)
Assistant Attorneys General
150 S. Main Street
Providence, RI 02903
Tel: (401) 274-4400
srice@riag.ri.gov
sprovazza@riag.ri.gov

Max Wistow, Esq. (#0330)
Benjamin Ledsham, Esq. (#7956)
Wistow, Sheehan & Loveley, P.C.
127 Dorrance Street
Providence, RI 02903
Tel: (401) 831-2700
mwistow@wistbar.com
bledsham@wistbar.com

Jonathan N. Savage, Esq. (#3081)
Michael P. Robinson, Esq. (#6306)
Edward D. Pare III, Esq. (#9698)
Alyssa L. Lemire, Esq. (#10446)
Savage Law Partners, LLP
564 South Water Street
Providence, RI 02903
Tel: (401) 238-8500
Fax: (401) 648-6748
js@savagelawpartners.com
mrobinson@savagelawpartners.com
epare@savagelawpartners.com
alemire@savagelawpartners.com

FOR THE DEFENDANTS:

Defendant,
AECOM Technical Services, Inc.,
By its Attorneys,
COZEN O'CONNOR,

Courtney Ann Richards (#10593)
Wendy Venoit (*pro hac vice* forthcoming)
Michael Filbin (*pro hac vice* forthcoming)
200 State Street, Suite 1105
Boston, MA 02109
Tel: (617) 849-5100
Fax: (857-488-4870
crichards@cozen.com
wvenoit@cozen.com
mfilbin@cozen.com

Lawrence M. Prosen (*pro hac vice* forthcoming)
1200 19th Street, NW, Suite 300
Washington, DC 20036
Tel: (202) 304-1449
Fax: (202) 400-2715
lprosen@cozen.com

Defendant,
Aetna Bridge Company,
By its Attorneys,

Jackson C. Parmenter, Esq. (#8396)
KELLY, SOUZA & PARMENTER, P.C.
128 Dorrance Street, Suite 300
Providence, RI 02903
Tel.: (401) 490-7334
jparmenter@ksplawpc.com

Defendant,
Aries Support Services, Inc.,
By its Attorneys,

Thomas W. Heald, Esq., Reg. #1694
HEALD LAW, LTD.
One Turks Head Place
76 Westminster Street, Suite 420
Providence, RI 02903
Phone: (401) 421-1500
Fax: (401) 331-5886
twh@healdlaw.net

Defendant,

Barletta Heavy Division, Inc.,
By its Attorneys,

Jeffrey B. Pine (#2278)
Lynch & Pine
One Park Row, 5th Floor
Providence, RI 02903
Tel: (401) 274-3306
jpine@lynchpine.com

Defendant,

Barletta/Aetna I-195 Washington
Bridge North Phase 2 JV,
By its Attorneys,

Jeffrey B. Pine (#2278)
Lynch & Pine
One Park Row, 5th Floor
Providence, RI 02903
Tel: (401) 274-3306
jpine@lynchpine.com

Jackson C. Parmenter, Esq. (#8396)
KELLY, SOUZA & PARMENTER, P.C.
128 Dorrance Street, Suite 300
Providence, RI 02903
Tel.: (401) 490-7334
jparmenter@ksplawpc.com

Defendant,

Collins Engineers, Inc.,
By its Attorneys,

Richard G. Fallago, Esq. (#9349)
Gordon Rees LLP
55 Pine Street, 5th Floor
Providence, RI 02903
rfallago@grsm.com

Defendant,

Commonwealth Engineers &
Consultants, Inc.,
By its Attorneys,

Susan M. Silva, R.I. Bar #9505
Peabody & Arnold LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210-2261
(617) 951-2100
ssilva@peabodyarnold.com

Defendant,

Jacobs Engineering, Inc.,
By its Attorneys,

Defendant,

Michael Baker International, Inc.,
By its Attorneys,

Christopher C. Whitney (#3261)
Katharine E. Kohm (#8194)
Sheya A. Rivard (#10714)
PIERCE ATWOOD LLP
One Citizens Plaza, 10th Floor
Providence, RI 02903
Telephone 401-490-3408
Fax 401-588-5166
cwhitney@PierceAtwood.com
kkohm@PierceAtwood.com
srivard@PierceAtwood.com

Defendant,

PRIME AE Group, Inc.
By its Attorneys,

John A. Donovan, III #5707
SLOANE AND WALSH, LLP
One Boston Place
201 Washington Street, Suite 1600
Boston, MA 02108
P: (617) 523-6010
jdonovan@sloanewalsh.com

Defendant,

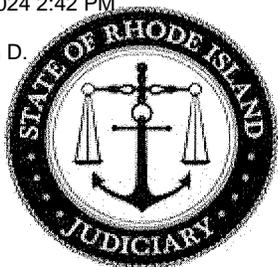
Steere Engineering, Inc.,
By its Attorneys,

Warren D. Hutchison (#5571)
Freeman Mathis & Gary, LLP
60 State Street, Suite 600
Boston, MA 02109
Tel: (617) 963-5967
whutchison@fmglaw.com

Defendant,
TranSystems Corporation,
By its Attorneys,

Mark P. Dolan, Esq. (#3280)
RICE DOLAN & KERSHAW
72 Pine Street, Suite 300
Providence, RI 02903
(401) 272-8800
(401) 421-7218 (fax)
mdolan@ricedolan.com

Exhibit 1



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

VANESSA HANGEN BRUSTLIN, INC., et al.

Vanessa Hangen Brustlin, Inc. hereby requests that Amanda E. Mathieu
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.*)

Attorney Mathieu specializes in the complex area of law of complex construction litigation. Attorney Mathieu has represented clients in over 50 cases involving complex construction litigation.

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.)

Attorney Mathieu has a long-standing attorney-client relationship with Vanessa Hangen Brustlin, Inc. ("VHB"). Attorney Mathieu has represented VHB in various matters including matters in which VHB was a party to litigation, pre-claim matters, and matters in which VHB was a non-party witness for approximately 10 years.

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.)*

N/A

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.)*

N/A

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.)

N/A

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/ Brian C. Newberry, Esq. Signature	Rhode Island Bar Number 5542
	Date: 10/24/2024
Attorney for: <u>Vanessa Hangen Brustlin, Inc.</u>	
/s/ Amanda E. Mathieu, Esq. Signature Pro Hac Vice Counsel/Applicant	

Certificate of Service

I, Brian C. Newberry, Esq., 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 All counsel of record _____, on this 24th day of October 2024.

/s/ Brian C. Newberry, Esq.

Exhibit 2



State of Rhode Island Judiciary

Attorney Certification 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

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
Massachusetts	November 21, 2014	690736	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
N/A			

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?
N/A			

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/ Amanda E. Mathieu, Esq. Signature Pro Hac Vice Counsel/Applicant	Date 10/24/2024
Firm Name and Address: Lewis Brisbois Bisgaard & Smith, LLP, 60 State Street, 23rd Floor, Boston, MA 02109	

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/ Brian C. Newberry, Esq. Signature	Rhode Island Bar Number 5542
Date: 10/24/2024	

Exhibit 3



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
 6th Division 4th Division 3rd Division 2nd Division

I, Maureen Hogan, 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 Amanda E. Mathieu, Esq. is not a member of the Rhode Island bar, but that Attorney Amanda E. Mathieu, Esq. has applied for permission to appear in this case on my behalf;

3. I am also aware that, if Attorney Amanda E. Mathieu, Esq. 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 Amanda E. Mathieu, Esq. 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.

Witness

Maureen Hogan
Client Name

Date

October 8, 2024
Client Signature