



State of Rhode Island Judiciary

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

Case Number
PC-2024-4526

- 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.

Jacobs Engineering Group, Inc. hereby requests that John C. Blessington
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.*)

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.)

(See Exhibit A attached)

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/ <u>Michael R. Creta</u> Signature	Rhode Island Bar Number 9535
	Date: 11/8/2024
Attorney for: <u>Jacobs Engineering Group, Inc.</u>	
/s/ <u>Michael R. Creta</u> Signature Pro Hac Vice Counsel/Applicant	

Certificate of Service

I, Michael R. Creta, hereby certify that a true copy of this Miscellaneous Petition for Admission Pro Hac Vice with accompanying attorney and client certifications were sent ^{e-served} ~~postage prepaid~~ to all counsel of record, on this 8 day of November 2024.

Michael R. Creta

Exhibit A

K&L Gates LLP has been panel counsel for Jacobs Engineering Group, Inc. (“Jacobs”) since 2017 with Attorney Blessington as the relationship partner. Additionally, Attorney Blessington has been lead counsel in the representation of Jacobs related to the Washington Bridge since April 2024. In that capacity, Attorney Blessington has worked with the Rhode Island Department of Transportation (“RIDOT”) on behalf of Jacobs, and prior to the filing of this litigation, Attorney Blessington communicated with RIDOT and parties to this litigation regarding Jacobs’s involvement in the Washington Bridge. Attorney Blessington is intimately familiar with Jacobs’s role in inspecting the Washington Bridge, the facts at issue in this litigation, and the relationship between the parties to the litigation. Jacobs wishes for Attorney Blessington to continue to represent it in connection with this litigation for continuity, and to avoid the unneeded expense and delay of hiring additional counsel to be brought up to speed on the events which Attorney Blessington has been involved to date.