

**BUSINESS CALENDAR (STERN, J.)**  
**HEARING DATE: TBD @ TBD**

STATE OF RHODE ISLAND  
PROVIDENCE COUNTY

SUPERIOR COURT

STATE OF RHODE ISLAND, :

*Plaintiff,* :

v. :

C.A. No. PC-2024-04526

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., :

TRANSYSYSTEMS CORPORATION, and :

VANASSE HANGEN BRUSTLION, INC. :

*Defendants.* :

**DEFENDANT BARLETTA HEAVY DIVISION INC.'S MOTION TO DISMISS**  
**PLAINTIFF'S COMPLAINT**

**NOW COMES**, Defendant, Barletta Heavy Division, Inc. (“Barletta”), and hereby moves to dismiss Counts XV–XX of the State of Rhode Island’s (the “State’s”) Complaint as they pertain to Barletta pursuant to Rule 12(b)(6) of the Rhode Island Superior Court Rules of Civil Procedure. In support of its Motion, Barletta hereby incorporates by reference the arguments set forth in Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV’s motion to dismiss in their entirety as if fully set forth herein.

**WHEREFORE**, for the reasons set forth in the motion to dismiss filed by Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV, Barletta respectfully requests that

Counts XV–XX of the Plaintiff’s Complaint be dismissed and that the Court dismiss Barletta from the State’s action in its entirety.

Dated: October 31, 2024

Respectfully submitted,

**FOLEY & LARDNER LLP**

/s/ Jeffrey R. Blease

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Washington Bridge North Phase 2 JV and  
Barletta*

**LYNCH & PINE**

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*Attorney for Barletta/Aetna I-195 Washington  
Bridge North Phase 2 JV and Barletta*

**CERTIFICATE OF SERVICE**

I hereby certify that on Thursday, October 31, 2024, I filed and served *Barletta Heavy Division, Inc.'s Motion to Dismiss Plaintiff's Complaint* through the electronic filing system on all counsel 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/ Jeffery B. Pine

Jeffrey B. Pine