

**BUSINESS CALENDAR HEARING**  
**January 21, 2025 at 9:30am**

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

**PLAINTIFF’S OBJECTION TO BARLETTA HEAVY DIVISION INC.’S MOTION TO DISMISS**

NOW COMES the Plaintiff, the State of Rhode Island (the “Plaintiff”), by and through its undersigned counsel, and hereby objects to Defendant Barletta Heavy Division, Inc.’s Motion to Dismiss the Plaintiff’s Complaint. In support hereof, the Plaintiff submits its Consolidated Response in Opposition to Defendants’ Rule 12 Motions, filed contemporaneously herewith.

[Signatures appear on next page.]

Respectfully submitted,  
Plaintiff,  
STATE OF RHODE ISLAND

By Its Attorneys,

/s/ Stephen N. Provazza  
PETER F. NERONHA,  
ATTORNEY GENERAL  
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

/s/ Theodore J. Leopold  
Theodore J. Leopold (admitted *pro hac vice*)  
Leslie M. Kroeger (admitted *pro hac vice*)  
Diana L. Martin (admitted *pro hac vice*)  
Poorad Razavi (admitted *pro hac vice*)  
Takisha Richardson (admitted *pro hac vice*)  
Adnan Toric (admitted *pro hac vice*)  
Cohen Milstein  
11780 U.S. Highway One  
Suite N500  
Palm Beach Gardens, FL 33408  
tleopold@cohenmilstein.com  
lkroeger@cohenmilstein.com  
dmartin@cohenmilstein.com  
prazavi@cohenmilstein.com  
trichardson@cohenmilstein.com  
atoric@cohenmilstein.com

[Continued on next page.]

/s/ Jonathan N. Savage  
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  
[js@savagelawpartners.com](mailto:js@savagelawpartners.com)  
[mrobinson@savagelawpartners.com](mailto:mrobinson@savagelawpartners.com)  
[epare@savagelawpartners.com](mailto:epare@savagelawpartners.com)  
[alemire@savagelawpartners.com](mailto:alemire@savagelawpartners.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7<sup>TH</sup> day of January 2025, I electronically filed and served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson