

**BUSINESS CALENDAR (STERN, J.)
HEARING DATE: JANUARY 21, 2025 @ 9:30AM**

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 REPLY TO THE STATE OF
RHODE ISLAND'S OBJECTION TO BARLETTA'S RULE 12 MOTION TO DISMISS**

NOW COMES, Defendant, Barletta Heavy Division, Inc. (“Barletta”), and hereby incorporates by reference the arguments set forth in Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV’s (“JV”) Reply (“Reply”) to the State’s Objection in its entirety as if fully set forth herein.

WHEREFORE, for the reasons set forth in the Reply 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: January 14, 2025

Respectfully submitted,

FOLEY & LARDNER LLP

/s/ Jeffrey R. Blease
Jeffrey R. Blease (MB #675247)
111 Huntington Avenue, Suite 2500
Boston, MA 02199
jblease@foley.com
Admitted Pro Hac Vice

Christopher D. Mellado (FB #1018915)
301 E. Pine Street, Suite 1200
Orlando, FL 32801
chris.mellado@foley.com
Admitted Pro Hac Vice

*Lead Counsel for Barletta/Aetna I-195
Washington Bridge North Phase 2 JV and
Barletta Heavy Division, Inc.*

LYNCH & PINE

/s/ Jeffrey B. Pine
Jeffrey B. Pine #2278
1 Park Row, 5th Floor
Providence, Rhode Island 02903
jpine@lynchpine.com

*Attorney for Barletta/Aetna I-195 Washington
Bridge North Phase 2 JV and Barletta Heavy
Division, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, January 14, 2025, I filed and served *Defendant Barletta Heavy Division Inc. 's Reply to the State of Rhode Island's Objection to Barletta's Rule 12 Motion to Dismiss* 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