

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-2024-0526  
***Business Calendar***

**PLAINTIFF STATE OF RHODE ISLAND'S RESPONSES TO DEFENDANT VANASSE  
HANGEN BRUSTLIN, INC.'S REQUEST FOR PRODUCTION DATED NOVEMBER  
12, 2024**

Pursuant to Rule 34 of the Superior Court Rule of Civil Procedure, now comes the Plaintiff, State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following Responses to Defendant, Vanasse Hangen Brustlin, Inc.'s Request for Production dated November 12, 2024:

**REQUEST NO. 1**

All documents upon which you rely in support of the claims made in the Complaint.

**RESPONSE:**

**The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure**

by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

## **REQUEST NO. 2**

Any and all documents concerning the allegations made in the Complaint.

### **RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

## **REQUEST NO. 3**

Any and all documents which you relied upon and/or referenced in your answers to VHB's First Set of Interrogatories to Plaintiff.

### **RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. The Plaintiff also objects to this Request as premature. The Plaintiff anticipates that documents and

evidence supportive of its allegations are in the possession of all named Defendants, including but not limited to documents maintained by and electronic communications of employees and agents of all named Defendants. Plaintiff further anticipates that additional third parties with relevant information may be revealed as discovery progresses. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

#### **REQUEST NO. 4**

Any and all documents which evidence, reflect or reference any communications, including, without limitation, reports, tape recordings, minutes, transcripts, correspondence, memoranda, notes, or transmittals, and emails by and between you and any other person or entity concerning the events referred to in the Complaint.

#### **RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, Plaintiff states that discovery has just begun and that the documents requested are likely also within the possession and/or control of Defendant VHB. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

#### **REQUEST NO. 5**

Any and all documents that you intend to introduce as exhibits at the trial of this action.

#### **RESPONSE:**

It is undetermined at this time what documents Plaintiff may introduce as exhibits at the trial of this action. Plaintiff will supplement this response as provided in the Superior Court's Rules of Civil Procedure and the Court's trial order.

## **REQUEST NO. 6**

The resume or curriculum vitae of each expert witness whom you intend to call at the trial of this action.

### **RESPONSE:**

**The Plaintiff objects to this request as prematurely seeking disclosure of the Plaintiffs' experts. The Plaintiff will supplement this response as required by the Superior Court's Rules of Civil Procedure and the Court's trial order.**

## **REQUEST NO. 7**

Any and all documents provided to, to be provided to, prepared by and/or relied upon by your experts in this action.

### **RESPONSE:**

**The Plaintiff objects to this request as prematurely seeking the Plaintiffs' experts' opinions. The Plaintiff further objects to this request as seeking documents and/or communications beyond the scope of permissible discovery under Rule 26(b)(4) of the Superior Court Rules of Civil Procedure, which protects from disclosure, among other things, communications between the Plaintiff's attorneys and any witness designated as an expert. Subject to those objections, and without waiving the same, Plaintiff will supplement this response as required by the Superior Court's Rules of Civil Procedure and the Court's trial order.**

## **REQUEST NO. 8**

Any and all written statements and/or reports, signed or unsigned, of any and all expert witnesses, retained by you with regard to the allegations contained in the Complaint.

### **RESPONSE:**

**The Plaintiff objects to this request as prematurely seeking the Plaintiffs' experts' opinions. The Plaintiff further objects to this request as seeking documents and/or communications beyond the scope of permissible discovery under Rule 26(b)(4) of the Superior Court Rules of Civil Procedure, which protects from disclosure as work-product drafts of any reports prepared by an expert regardless of the form in which the draft is recorded, including, as requested here, unsigned reports.**

## **REQUEST NO. 9**

Any and all written statements or reports, signed or unsigned, of any and all witnesses to the events alleged in the Complaint, and copies of all written transcriptions of any statements of such witnesses taken on a recording instrument.

### **RESPONSE:**

**The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure.**

## **REQUEST NO. 10**

Any and all documents relating to, referring to, or evidencing communications between you and VHB concerning the allegations contained in the Complaint.

### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff also objects to this Request because it seeks information in the possession of, known to, or otherwise equally available to Defendant. Subject to those objections, and without waiving the same, see folder labeled VHB contemporaneously with this Response. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

## **REQUEST NO. 11**

Any and all documents relating to, referring to, or evidencing communications between you and AECOM Technical Services, Inc. concerning the allegations contained in the Complaint.

### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant AECOM Technical Services, Inc. will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled AECOM Tech produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 12**

Any and all documents relating to, referring to, or evidencing communications between you and Aetna Bridge Company concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Aetna Bridge Company will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled AETNA bridge produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 13**

Any and all documents relating to, referring to, or evidencing communications between you and Aries Support Services, Inc. concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Aries Support Services, Inc. will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled ARIES Support produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

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#### **REQUEST NO. 14**

Any and all documents relating to, referring to, or evidencing communications between you and Barletta Heavy Division, Inc. concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Barletta Heavy Division, Inc. will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled Barletta Heavy produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 15**

Any and all documents relating to, referring to, or evidencing communications between you and Barletta/Aetna I-195 Washington Bridge North Phase 2 JV concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled Barletta/AETNA produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 16**

Any and all documents relating to, referring to, or evidencing communications between you and Collins Engineers, Inc. concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Collins Engineers will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled Collins Engineer produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 17**

Any and all documents relating to, referring to, or evidencing communications between you and Commonwealth Engineers & Consultants, Inc. concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Commonwealth Engineers & Consultants, Inc. will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled Commonwealth produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 18**

Any and all documents relating to, referring to, or evidencing communications between you and Jacobs Engineering Group, Inc. concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Jacobs Engineering Group, Inc. will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled Jacobs Engineer produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**



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### **REQUEST NO. 19**

Any and all documents relating to, referring to, or evidencing communications between you and Michael Baker International, Inc. concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Michael Baker, International will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled Michael Baker produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

### **REQUEST NO. 20**

Any and all documents relating to, referring to, or evidencing communications between you and PRIME AE Group, Inc. concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant PRIME AE Group, Inc. will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled PRIME AE produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

### **REQUEST NO. 21**

Any and all documents relating to, referring to, or evidencing communications between you and Steere Engineering, Inc. concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request because it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun and that Defendant Steere Engineering will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled Steere Engineering produced contemporaneously with this Response. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 22**

Any and all documents relating to, referring to, or evidencing communications between you and Transsystems Corporation concerning the allegations contained in the Complaint.

#### **RESPONSE:**

**The Plaintiff objects to this Request to the extent it seeks information that is the attorney's work product. Plaintiff states that discovery has just begun, and that Defendant Transsystems Corporation will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see folder labeled Transsystems produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 23**

All documents concerning any communications, meetings or discussions (including, without limitation, correspondence, e-mails, notes and internal memoranda), that occurred between you and any party in this case.

#### **RESPONSE:**

**The Plaintiff objects to this Request because it seeks information that is the attorney's work product. The Plaintiff states that discovery has just begun and that Defendants will likely produce documents sought by Defendant VHB to Plaintiff. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

#### **REQUEST NO. 24**

All documents concerning the damages that you have allegedly sustained as a result of the allegations contained in the Complaint.

**RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. The Plaintiff further objects to this Request because it prematurely asks Plaintiff to provide or otherwise describe the entirety of Plaintiff's factual and expert evidence and testimony that Plaintiff will present at trial to prove its allegations before Plaintiff has had an opportunity to conduct discovery. Subject to those objections, and without waiving the same, Plaintiff will produce responsive documents, if any, in conformity with the forthcoming ESI Protocol. The Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

**REQUEST NO. 25**

All documents concerning any allegations of negligence directed at VHB.

**RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. The Plaintiff further objects to this Request because it prematurely asks Plaintiff to provide or otherwise describe the entirety of Plaintiff's factual and expert evidence and testimony that Plaintiff will present at trial to prove its allegations before Plaintiff has had an opportunity to conduct discovery. Subject to those objections, and without waiving the same, see folder labeled VHB produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

**REQUEST NO. 26**

Any and all documents which you allege support your claims as set forth in the Complaint.

**RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. The Plaintiff further objects to this Request because it prematurely asks Plaintiff to provide or otherwise describe the entirety of Plaintiff's factual and expert evidence and testimony that Plaintiff will present at trial to prove its allegations before Plaintiff has had an opportunity to conduct discovery. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

#### **REQUEST NO. 27**

All photographs, films, diagrams, videotapes, depictions or any other documents concerning the allegations in the Complaint.

#### **RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

#### **REQUEST NO. 28**

Any and all documents which you have received from any person or entity regarding the allegations in the Complaint.

#### **RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, Plaintiff states that discovery has just begun and that the documents requested are likely also within the possession and/or control of Defendant VHB. The Plaintiff will produce non-privileged responsive documents exclusively within the Plaintiff's custody or control, if any, in conformity with the forthcoming ESI Protocol. The Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

#### **REQUEST NO. 29**

Any and all documents concerning the decision in or around 2013 to rehabilitate the Bridge versus demolish and rebuild it.

#### **RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. The Plaintiff further objects to this Request because it prematurely asks Plaintiff to provide or otherwise describe the entirety of Plaintiff's factual and expert evidence and testimony that Plaintiff will present at trial to prove its allegations before Plaintiff has had an opportunity to conduct discovery. Subject to those objections, and without waiving the same, Plaintiff will produce responsive documents, if any, in conformity with the forthcoming ESI Protocol. The Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

#### **REQUEST NO. 30**

Any and all documents concerning inspections of the Bridge's post-tensioned cantilever beams and/or tie down rods from the time of the Bridge's original construction to present.

#### **RESPONSE:**

*Cohen Milstein Sellers & Toll, PLLC  
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408  
Telephone: 561.515.1400 Facsimile: 561.515.1401*

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

#### **REQUEST NO. 31**

Any and all documents related to and/or documenting inspections completed by the State's Bridge Maintenance Division from the time of the Bridge's original construction to present.

#### **RESPONSE:**

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT\_000000001-RIDOT\_000022353 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

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Respectfully Submitted,  
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By its Attorneys,

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/s/ Theodore J. Leopold  
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/s/ Jonathan N. Savage

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of April 2025, I electronically served this document through the electronic filing system on the following:

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