SUPERIOR COURT
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) C.A. No. PC-2024-04526 Business Calendar
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NOTICE OF SERVING RESPONSES TO BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV SECOND SET OF INTERROGATORIES TO PLAINTIFF DATED JUNE 20, 2025.

Defendants.

Pursuant to Rules 26 and 33 of the Superior Court Rules of Civil Procedure, now comes the Plaintiff, the State of Rhode Island (the "Plaintiff" or "State"), hereby serves the following Notice of Serving Responses to Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV's Second Set of Interrogatories dated June 20, 2025.

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PLAINTIFF'S RESPONSES TO DEFENDANT BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV'S SECOND SET OF INTERROGATORIES DATED JUNE 20, 2025.

- 8. Is YOUR response to each request for admission in the JV's First Requests for Admissions to RIDOT, dated June 13, 2025, an unqualified admission? If not, for each response that is not an unqualified admission:
 - a. State the number of the request;
 - b. State all facts on which you base YOUR response;
 - c. State the names, addresses, and telephone numbers of all persons who have knowledge of those facts; and
 - d. Identify all DOCUMENTS and other tangible things that support YOUR response and state the name, address, and telephone number of the person who has each DOCUMENT or thing.

RESPONSE: See RFA Responses.

I, Loren Doyle, under the pains and penalty of perjury, declare that the foregoing is true based upon matters within my personal knowledge and information that has been assembled and provided to me and that the answers provided are correct, according to the best of my knowledge.

Bv: Loren Dovle

Dated: 9/2/2025

STATE OF RHODE ISLAND COUNTY OF PROVIDENCE

On this 2ⁿ² day of <u>september</u>, 2025, before me, the undersigned notary, personally appeared Loren Doyle personally known to the notary, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his knowledge.

NOTARY PUBLIC

My commission expires: 5/3

5/21/2028

Notary identification number: 57513



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As to Objections, Respectfully Submitted, Plaintiff, State of Rhode Island, By its Attorneys,

<u>/s/ Stephen N. Provazza</u>

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/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

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of September 2025, I electronically served this document through the electronic filing system on counsel of record. The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Edward D. Pare III