

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

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.,

TRANSYSTEMS CORPORATION, and

VANASSE HANGEN BRUSTLION, INC.

*Defendants.*

**BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV'S**  
**MOTION TO COMPEL**

Defendant/Counter Plaintiff Barletta/Aetna I-195 Washington Bridge North Phase 2 JV ("JV"), pursuant to Rules 26 and 37 of the Rhode Island Superior Court Rules of Civil Procedure, and for the reasons set forth in the accompanying Memorandum of Law, respectfully moves for an order:

1. Overruling Plaintiff/Counter Defendant the State of Rhode Island's deliberative process privilege objections and compelling the State to produce, in full and without redactions, all documents currently redacted on that basis;

2. Ordering the State to remove all “non-responsive” redactions and prohibiting use of “non-responsive” as a privilege designation; and
3. Applying such relief prospectively to all future productions to ensure complete disclosure of responsive materials and to avoid repeated motion practice on these same issues.

WHEREFORE, the JV respectfully requests that the Court grant this Motion to Compel and award such further relief as the Court deems just and proper.

Dated: December 12, 2025

Respectfully submitted,

**FOLEY & LARDNER LLP**

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

**LYNCH & PINE**

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Bridge North Phase 2 JV and Barletta*  
**KELLY, SOUZA, PARMENTER &  
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*Attorney for Barletta/Aetna I-195 Washington  
Bridge North Phase 2 JV and Lead Counsel  
for Aetna*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of December, 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/ Jeffrey B. Pine