

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.,)
TRANSYSSTEMS CORPORATION, and)
VANASSE HANGEN BRUSTLION, INC.)
)
Defendants.)

C.A. No. PC-2024-04526

JOINT STATUS REPORT

Now come the Plaintiff and the Defendants (together, the “Parties”), by and through their respective counsel, and pursuant to Section XVIII of the Scheduling Order entered on July 30, 2025 (the “Scheduling Order”), hereby submit this Joint Status Report in advance of the monthly conference scheduled for February 3, 2026:

1. Since the last conference, the motions to compel filed, respectively, by Defendant AECOM Technical Services, Inc. (“AECOM”) and Defendant/Counterclaimant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV (the “JV”) were withdrawn without prejudice pursuant to the Stipulations filed by the JV on January 22, 2026, and by AECOM on January 23, 2026,

based on the State's representations that its supplemental responses and productions would address the issues raised in those motions.

2. The Parties continue to engage in the exchange of written discovery, and, as necessary, meet and confer conferences. The State has made some supplemental document production and committed to significant additional supplemental production by January 31, 2026.

3. However, the JV contends that the State's supplemental responses did not cure many of the deficiencies identified in the JV's motions to compel. The JV outlined these issues in a January 23, 2026 deficiency letter, which also requested a meet-and-confer and a cure by January 30, 2026. Absent prompt resolution, the JV believes additional discovery motions may be necessary.

FOR THE STATE OF RHODE ISLAND:

By its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Sarah W. Rice

Sarah W. Rice, Esq. (#10588)
Assistant Attorneys General
150 S. Main Street
Providence, RI 02903
Tel: (401) 274-4400
srice@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

/s/ Jonathan N. Savage

Jonathan N. Savage, Esq. (#3081)
Michael P. Robinson, Esq. (#6306)
Edward D. Pare III, Esq. (#9698)
Savage Law Partners, LLP
564 South Water Street
Providence, RI 02903
Tel: (401) 238-8500
Fax: (401) 648-6748
js@savagelawpartners.com
mrobinson@savagelawpartners.com
epare@savagelawpartners.com

FOR THE DEFENDANTS:

**Defendant,
AECOM Technical Services, Inc.,
By its Attorneys,
COZEN O'CONNOR,**

/s/ Lawrence M. Prosen

Courtney Ann Richards, Esq. (#10593)
Wendy Venoit, Esq. (#568657)
Michael Filbin, Esq. (#705341)
200 State Street, Suite 1105
Boston, MA 02109
Tel.: (617) 849-5100
Fax: (857-488-4870
crichards@cozen.com
wvenoit@cozen.com
mfilbin@cozen.com

Lawrence M. Prosen, Esq. (admitted *pro hac vice*)
1200 19th Street, NW, Suite 300
Washington, DC 20036
Tel.: (202) 304-1449
Fax: (202) 400-2715
lprosen@cozen.com

Amanda Prosek, Esq. (#7677)
Lamontagne, Spaulding & Hayes, LLP
Garden City Center
100 Midway Road Suite 15
Cranston, RI 02920
Office: (401) 270-7094
Fax: (401) 490-0555
aprosek@lshattorneys.com

**Defendant,
Aetna Bridge Company,
By its Attorneys,**

/s/ Jackson C. Parmenter

Jackson C. Parmenter, Esq. (#8396)
KELLY, SOUZA, PARMENTER & RESNICK, P.C.
128 Dorrance Street, Suite 300
Providence, RI 02903
Tel.: (401) 490-7334
jparmenter@ksplawpc.com

/s/ Jennifer C. Sheehan

Jennifer C. Sheehan, Esq. (#9545)
Hamel, Marcin, Dunn, Reardon & Shea, PC
350 Lincoln Street, Suite 1101
Hingham, MA 02043 (617) 482-0007
jsheehan@hmdrslaw.com

**Defendant,
Aries Support Services, Inc.,
By its Attorneys,**

/s/ John F. Kelleher

John F. Kelleher, Esq. (#3854)
Brent S. Davis, Esq. (#9081)
LaSalle & Kelleher, P.C.
One Turks Head Place
Providence, RI 02903
Tel.: (401) 421-8080, ext. 222
jkelleher@lasallekelleher.com
bdavis@lasallekelleher.com

Paul S. Callaghan, Esq. (#4931)
Higgins, Cavanagh & Cooney, LLP
10 Dorrance Street Suite 400
Providence, RI 02903

pcallaghan@hcc-law.com
Tel.: (401) 490-3921

**Defendant,
Barletta Heavy Division, Inc.,
By its Attorneys,**

/s/ Jeffrey R. Blease

Jeffrey R. Blease, Esq. (#675247) (admitted *pro hac vice*)
Foley & Lardner, LLP
111 Huntington Avenue, Suite 2500
Boston, Massachusetts 02199
Tel.: (617) 226-3155
jblease@foley.com
Lead Counsel for Barletta Heavy Division, Inc.

Benjamin J. Morris (CB #260148) (admitted *pro hac vice*)
11988 El Camino Real, Suite 400
San Diego, CA 92130
bmorris@foley.com

Chris D. Mellado (#1018915) (admitted *pro hac vice*)
301 E. Pine Street, Suite 1200
Orlando, FL 32801
chris.mellado@foley.com

Matthew Kass (WB #1121980) (admitted *pro hac vice*)
777 E. Wisconsin Avenue
Milwaukee, WI 53202
mkass@foley.com

/s/ Jeffrey B. Pine

Jeffrey B. Pine, Esq. (#2278)
Lynch & Pine
One Park Row, 5th Floor Providence, RI 02903
Tel.: (401) 274-3306
jpine@lynchpine.com

**Defendant,
Barletta/Aetna I-195 Washington
Bridge North Phase 2 JV,
By its Attorneys,**

/s/ Jeffrey R. Blease

Jeffrey R. Blease, Esq. (#675247) (admitted *pro hac vice*)
Foley & Lardner, LLP

111 Huntington Avenue, Suite 2500
Boston, Massachusetts 02199
Tel.: (617) 226-3155
jblease@foley.com
Lead Counsel for Barletta/Aetna I-195 Washington Bridge North Phase 2 JV

Benjamin J. Morris (CB #260148) (admitted *pro hac vice*)
11988 El Camino Real, Suite 400
San Diego, CA 92130
bmorris@foley.com
Chris D. Mellado, Esq. (#1018915) (admitted *pro hac vice*)
301 E. Pine Street, Suite 1200
Orlando, FL 32801
chris.mellado@foley.com

Matthew Kass (WB #1121980) (admitted *pro hac vice*)
777 E. Wisconsin Avenue
Milwaukee, WI 53202
mkass@foley.com
/s/ Jeffrey B. Pine

Jeffrey B. Pine, Esq. (#2278)
Lynch & Pine
One Park Row, 5th Floor
Providence, RI 02903
Tel: (401) 274-3306
jpine@lynchpine.com

Jackson C. Parmenter, Esq. (#8396)
KELLY, SOUZA, PARMENTER & RESNICK, P.C.
128 Dorrance Street, Suite 300
Providence, RI 02903
Tel.: (401) 490-7334
jparmenter@ksplawpc.com

**Defendant,
Collins Engineers, Inc.,
By its Attorneys,**

/s/ Richard M. Dighello
Richard M. Dighello, Jr., Esq. (#6733)
Updike, Kelly & Spellacy, P.C.
100 Pearl Street, 17th Floor
Hartford, CT 06123
Tel: (860) 548-2600
rdighello@uks.com

Defendant,

**Commonwealth Engineers &
Consultants, Inc.,
By its Attorneys,**

/s/ Susan M. Silva

Susan M. Silva, Esq. (#9505)
Katherine L. Kenney Esq. (*pro hac vice* granted)
Peabody & Arnold LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210-2261
(617) 951-2100
ssilva@peabodyarnold.com

**Defendant,
Jacobs Engineering, Inc.,
By its Attorneys,**

/s/ Michael R. Creta

Michael R. Creta, Esq. (#9535)
John C. Blessington (admitted *pro hac vice*)
K&L Gates LLP
1 Congress Street, Suite 2900
Boston, MA 02114
Tel. 617.951.9101
Fax 617.261.3175
michael.creta@klgates.com
john.blessington@klgates.com

**Defendant,
Michael Baker International, Inc.,
By its Attorneys,**

/s/ Katharine E. Kohm

Christopher C. Whitney, Esq. (#3261)
Katharine E. Kohm, Esq. (#8194)
Sheya A. Rivard, Esq. (#10714)
PIERCE ATWOOD LLP
One Citizens Plaza, 10th Floor
Providence, RI 02903
Telephone 401-490-3408
Fax 401-588-5166

cwhitney@PierceAtwood.com
kkohm@PierceAtwood.com
srivard@PierceAtwood.com

**Defendant,
PRIME AE Group, Inc.**

By its Attorneys,
/s/ Samuel E. Cote

John A. Donovan, III, Esq. (#5707)
Samuel E. Cote, Esq. (#10874)
Hayley Johnston
SLOANE AND WALSH, LLP
One Boston Place
201 Washington Street, Suite 1600
Boston, MA 02108
P: (617) 523-6010
jdonovan@sloanewalsh.com
scote@sloanewalsh.com
hjohnston@sloanewalsh.com

**Defendant,
Steere Engineering, Inc.,
By its Attorneys,**

/s/ Warren D. Hutchison

Warren D. Hutchison, Esq. (#5571)
Freeman Mathis & Gary, LLP
60 State Street, Suite 600
Boston, MA 02109
Tel.: (617) 963-5967
whutchison@fmglaw.com

**Defendant,
TranSystems Corporation,
By its Attorneys,**

/s/ Mark P. Dolan

Mark P. Dolan, Esq. (#3280)
RICE DOLAN & KERSHAW
72 Pine Street, Suite 300
Providence, RI 02903
(401) 272-8800
(401) 421-7218 (fax)
mdolan@ricedolan.com

**Defendant,
Vanasse Hangen Brustlin, Inc.,
By its Attorneys,**

/s/ Brian C. Newberry
Brian C. Newberry, Esq. (#5542)
LEWIS BRISBOIS
BISGAARD & SMITH LLP
One Citizens Plaza, Suite 1120
Providence, RI 02903
P: (401) 406-3310
F: (401) 406-3312
Brian.newberry@lewisbrisbois.com

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January, 2026, 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/ Danielle M. Smith