

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)
)
VS.)
)
AECOM TECHNICAL SERVICES, INC.,)
AETNI BRIDGE COMPANY,)
ARIES SUPPORT SERVICES, INC)
BARLETTA HEAVY DIVISION, INC.,)
BARLETTA/AETNI I-195 WASHINGTON)
BRIDGE NORTH PHASE 2 JV,)
COLLINS ENGINEERS &)
CONSULTANTS, INC.)
JACOBS ENGINEERING GROUP, INC.)
MICHAEL BAKER INTERNATIONAL INC.)
PRIME AE GROUP, INC.)
STEERE ENGINEERING, INC.)
TRANSYSTEMS CORPORATION, and)
VANISSE HANGEN BRUSTLIN, INC.)

C.A. No. PC-2024-4526

ANSWER OF DEFENDANT, ARIES SUPPORT SERVICES, INC.

PARTIES

1. Admitted.

2, 3. Plaintiff's allegations are not directed toward this defendant and therefore no response is given.

4. Admitted.

5-14. Plaintiff's allegations are not directed toward this defendant and therefore no response is given.

JURISDICTION AND VENUE

15-17. Plaintiff sets forth legal conclusions to which no response is required.

FACTS

A. The Design and Construction of the Washington Bridge

18-20. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

21. Defendant admits that the Washington Bridge is comprised of eighteen spans. Defendant denies the remainder of plaintiff's allegations as comprehensively averred.

22-32. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

B. The Lichtenstein Report

33-39. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

C. The 1996-1998 Rehabilitation of the Washington Bridge

40-41. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

D. The 2011 MBI Inspection

42-45. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

E. The State Engages AECOM for the Complete Design of the Rehabilitation of the Washington Bridge: A Design-Bid Build Project

46-59. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

60. Defendant admits that it contracted with AECOM to perform specific tasks on the Washington Bridge under AECOM's direction in 2014 and 2015. Defendant denies the remainder of plaintiff's allegations as comprehensively averred.

F. AECOM Inspects the Washington Bridge and Transmits Its Technical Evaluation Report and Its Inspection Report.

61. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

G. RIDOT Receives and Relies on AECOM's Final Construction Plans

62-65. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

H. The Cardi Corporation Contract

66-67. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

I. Other Inspections

68-75. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

**J. A Second Attempt at Rehabilitation of the Washington Bridge
A Design Build Rehabilitation Project**

76,77. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

K. The Joint Venture Embarks

78-91. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

L. The Emergency Closure of the Washington Bridge

92-95. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

M. Physical Wear and Tear Damage to Eastbound Washington Bridge

96-100. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

101. Defendant admits that westbound traffic was rerouted to the eastbound side of the Washington Bridge. Defendant denies the remainder of plaintiff's allegations as comprehensively averred.

102-106. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

CAUSES OF ACTION

COUNT I

107-110. Count I is not directed toward this defendant and therefore no response is required.

COUNT II

NEGLIGENCE

AECOM, Steere, Prime and Aries Support Services

111. Defendant incorporates its responses to paragraphs 1 through 110 as if fully set forth herein.

112. Plaintiff sets forth a legal conclusion to which no response is required.

113. Denied as to this defendant.

114. Denied as to this defendant.

115. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

116. This defendant is without sufficient information with which to form a belief as to the truth of plaintiff's allegations and therefore denies the same.

117. Denied as to this defendant.

118. Plaintiff sets forth a legal conclusion to which no response is required.

WHEREFORE, Defendant demands judgment in its favor, plus costs.

COUNTS III THROUGH XVIII

119-199. Counts III through XVIII are not directed toward this defendant and therefore no response is required.

COUNT XIX

Declaratory Judgment Regarding Non-Contractual Indemnity
All Defendants

200. Defendant incorporates its responses to paragraphs 1 through 95 of plaintiff's complaint as if fully set forth herein.

201. Denied.

202. Denied.

202. Denied.

WHEREFORE, defendant, Aris Support Services, Inc, demands judgment in its favor, plus costs.

COUNT XX

Declaratory Judgment Regarding Contribution
All Defendants

204. Defendant incorporates its responses to paragraphs 1 through 95 of plaintiff's complaint as if fully set forth herein.

205. Denied.

206. Denied.

207. Denied.

WHEREFORE, defendant, Aries Support Systems, Inc., demands judgement in its favor, plus costs.

COUNT XXI

Negligent Misrepresentation
AECOM

208-213. Count XXI is not directed toward this defendant and therefore no response is required.

COUNT XXII
Negligent Misrepresentation
The Join Venture, Barletta, Aetna

214-220. Count XXII is not directed toward this defendant and therefore no response is required.

FIRST AFFIRMATIVE DEFENSE

Plaintiff's complaint fails to state a cause of action against this defendant.

SECOND AFFIRMATIVE DEFENSE

Plaintiff's alleged damages, if any, were caused by acts or omission of persons or entities for whom defendant is not responsible.

THIRD AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the Statute of Repose.

FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the Statute of Limitations.

FIFTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred, in whole or in part because plaintiff's alleged damage were caused by plaintiff's own negligence,

SIXTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred by the economic loss doctrine.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred because there is a failure of consideration.

JURY TRIAL DEMAND

Defendant, Aries Support Services, Inc. demands a jury trial on all issues so triable.

Defendant, Aries Support Services, Inc.,
By its attorneys,

/s/ John F. Kelleher
John F. Kelleher, Esq. (3854)
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CERTIFICATION

I hereby certify that on January 23, 2026, the within document was served upon all counsel of record through the Court's electronic filing system.

/s/ Brent S. Davis