

HEARING DATE: JANUARY 26, 2026 at 10:00 A.M.

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.,)
 TRANSYSSTMS CORPORATION, and)
 VANASSE HANGEN BRUSTLIN, INC.)
)
Defendants.)

C.A. No. PC-2024-04526

PLAINTIFF’S CONSOLIDATED OBJECTION TO
(1) DEFENDANT/COUNTERCLAIMANT BARLETTA/AETNA I-195 WASHINGTON
BRIDGE NORTH PHASE 2 JV’S MOTION TO COMPEL, (2) DEFENDANT AECOM
TECHNICAL SERVICES, INC.’S MOTION TO COMPEL RESPONSES TO
DOCUMENT REQUESTS AND PRIVILEGE LOG, (3) DEFENDANT AECOM
TECHNICAL SERVICES, INC.’S MOTION TO COMPEL ANSWERS TO
INTERROGATORIES AND REQUEST TO REMOVE THE INTERROGATORY CAP
UNDER RULE 33(b), (4) DEFENDANT VANASSE HANGEN BRUSTLIN, INC.’S
JOINDER TO MOTIONS TO COMPEL, AND
(5) DEFENDANT/COUNTERCLAIMANT BARLETTA/AETNA I-195 WASHINGTON
BRIDGE NORTH PHASE 2 JV’S SECOND MOTION TO COMPEL

Now comes the Plaintiff, the State of Rhode Island (the “State”), by and through its counsel, and, hereby submits this Objection to (1) Defendant/Counterclaimant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV’s (the “JV”) Motion to Compel, which was filed on December 12, 2025, (2) Defendant AECOM Technical Services, Inc.’s (“AECOM”) Motion to

Compel Plaintiff's Responses to Document Requests and Privilege Log, which was filed on December 15, 2025, (3) AECOM's Motion to Compel Answers to Interrogatories and Request to Remove the Interrogatory Cap Under Rule 33(b), which was filed on December 18, 2025, (4) Defendant Vanasse Hangen Brustlin, Inc.'s ("VHB") Joinder to Motions to Compel Filed by AECOM and the JV, which VHB filed on December 19, 2025, and (5) the JV's Second Motion to Compel, which was filed on December 22, 2025 (together, the "Motions to Compel"). For the reasons set forth in the Memorandum of Law submitted in support of this Objection—and in the absence of any justiciable issue for the Court to decide—the Court should deny the Motions to Compel.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

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STATE OF RHODE ISLAND

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CERTIFICATE OF SERVICE

I hereby certify that on the 13th 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/ Edward D. Pare III