

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.,)
TRANSYSTEMS CORPORATION, and)
VANASSE HANGEN BRUSTLION, INC.)
)
Defendants.)
_____)

C.A. No. PC-2024-04526

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

Defendant/Counter-Plaintiff Barletta/Aetna I-195 Washington Bridge North Phase 2 JV (“JV”), pursuant to Rules 26, 33, 36, 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. Compelling Plaintiff/Counter-Defendant, the State of Rhode Island (“State”), within fifteen (15) days of entry of the Court’s order, to produce all responsive custodian-based emails in full;

2. Compelling the State, within fifteen (15) days of entry of the Court's order, to produce all targeted discovery materials identified in Section I(B) of the JV's Memorandum of Law;
3. Ordering the State, within fifteen (15) days of entry of the Court's order, to serve full and complete amended answers to the JV's Interrogatories Nos. 7 and 8;
4. Ordering the State, within fifteen (15) days of entry of the Court's order, to serve full and complete amended responses to the JV's Requests for Admission Nos. 2, 3, 4, 11, 12, 14, 15, 16, 17, 18, 19, and 21; and
5. Expand or remove the interrogatory limit for good cause under Rule 33(b) to at least seventy-five (75) interrogatories or more as the Court deems appropriate.

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

Dated: December 22, 2025

Respectfully submitted,

FOLEY & LARDNER LLP

/s/ Jeffrey R. Blease
Jeffrey R. Blease (MB #675247)
111 Huntington Avenue, Suite 2500
Boston, MA 02199
jblease@foley.com
Admitted Pro Hac Vice

Benjamin J. Morris (CB #260148)
11988 El Camino Real, Suite 400
San Diego, CA 92130
bmorris@foley.com
Admitted Pro Hac Vice

Christopher D. Mellado (FB #1018915)
301 E. Pine Street, Suite 1200
Orlando, FL 32801
chris.mellado@foley.com
Admitted Pro Hac Vice

Matthew Kass (WB #1121980)

777 E. Wisconsin Avenue
Milwaukee, WI 53202
mkass@foley.com
Admitted Pro Hac Vice

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

LYNCH & PINE

/s/ Jeffrey B. Pine
Jeffrey B. Pine #2278
1 Park Row, 5th Floor
Providence, Rhode Island 02903
jpine@lynchpine.com

*Attorney for Barletta/Aetna I-195 Washington
Bridge North Phase 2 JV and Barletta*
**KELLY, SOUZA, PARMENTER &
RESNICK, P.C.**

/s/
Jackson C. Parmenter #8396
128 Dorrance Street, Suite 300
Providence, Rhode Island 02903
jparmenter@ksprlaw.com

*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 22nd 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