

HEARING DATE: APRIL 15, 2026 at 11:00 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.,)
TRANSYSTEMS 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 THIRD MOTION TO COMPEL AND (2) DEFENDANT
AECOM TECHNICAL SERVICES, INC.'S MOTION TO COMPEL PLAINTIFF'S
RESPONSES TO REQUESTS FOR ADMISSIONS & TO DEEM REQUESTS
ADMITTED

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") Third Motion to Compel, which was filed on March 27, 2026 and (2) Defendant AECOM Technical Services, Inc.'s ("AECOM") Motion to Compel Plaintiff's Responses to Requests for Admission & to Deem Requests Admitted, which was filed on March 27, 2026, (together,

the “Motions to Compel”). For the reasons set forth in the Memorandum of Law submitted in support of this Objection the Court should deny the Motions to Compel.

Respectfully Submitted,
Plaintiff,
State of Rhode Island,
By its Attorneys,

/s/ Sarah W. Rice

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/s/ Theodore J. Leopold

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¹ Practicing under Article II, Rule 2(f) of the R.I. Supreme Court Rules Pending Admission to the Rhode Island Bar.

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of April, 2026, I electronically filed and served this document through the electronic filing system on counsel of record. The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Edward D. Pare III