

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
Business Calendar

**NOTICE OF SERVING FOURTH SUPPLEMENTAL RESPONSES TO DEFENDANT
BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV, FIRST AND
SECOND SET OF INTERROGATORIES**

Pursuant to Rule 26 and 33 of the Superior Court Rules of Civil Procedure, now comes the Plaintiff, the State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following responses to Defendant Barletta/AETNA I-195 Washington Bridge North Phase 2 JV's First and Second Set of Interrogatories.

1. Identify the total cost of RIDOT's POST-CLOSURE investigation of the WASHINGTON BRIDGE, which resulted in RIDOT's decision to demolish and rebuild the WASHINGTON BRIDGE. Please itemize the costs by category or PERSON, including a description of the services provided and the respective cost amounts.

RESPONSE:

RIDOT incurred the following costs:

Bridge Inspection	\$1,887,055.78
Emergency Contract 2024-CB-012:	\$19,027,822.60
AECOMM	\$153,615.27
Total:	\$21,068,493.65

All costs subject to change, including but not limited to review by the State's experts.

See BATES RIDOT_000049853-RIDOT_000049920, produced contemporaneously with this response.

2. Identify RIDOT's budget(s) for inspection of the WASHINGTON BRIDGE between January 1, 2000 to December 11, 2023.

RESPONSE: There is no specific line item in RIDOT's budget from 2000 to 2023 for bridge inspections for the Washington Bridge.

3. Identify the individuals who set the inspection budget(s) for the WASHINGTON BRIDGE between January 1, 2000 to December 11, 2023.

RESPONSE: See Response and Production provided for in Interrogatory 2.

4. Identify each PERSON engaged by RIDOT to conduct inspections of the WASHINGTON BRIDGE between January 1, 2000 through the present date. Please itemize, by year and the PERSON(S) engaged by RIDOT, including their roles and the services they provided.

RESPONSE: See BATES RIDOT_000050806, produced contemporaneously with this response.

5. Explain what analysis RIDOT performed to determine the scope of work required for each inspection of the WASHINGTON BRIDGE.

RESPONSE: All bridges subject to the National Bridge Inspection Standards (NBIS) are inspected per the FHWA Bridge Inspection Reference Manual (BIRM) and the RI Bridge Inspection Manual. The scope of work for any bridge inspection is contained within these documents.

6. Identify all dates radiographic, ultrasonic shear wave tomography ("MIRA"), or ground penetrating radar ("GPR") testing was performed on the WASHINGTON BRIDGE, and on what components the testing was performed.

RESPONSE: Past evaluation and testing on the Washington Bridge 700 included the following:

In 1992, Lichtenstein was contracted to perform an emergency inspection, testing and evaluation of the cantilever beams and ship lap joints. Testing done included radiography, concrete compressive strength and chloride ion testing. The report has been provided.

In 1993/1994, testing was performed as part of the development for the 1996 rehabilitation contract. Testing performed included GPR (Ground Penetrating Radar), concrete testing for compressive strength, chloride ion, ph and half-cell; and Post Tensioning inspection and testing. The results and testing reports have been provided.

In 1996-1997, Impact Echo Testing was conducted by WDP for the 1996 rehabilitation contract. The results of the testing have been provided.

In 2014/2015, testing was performed as part of development for the 2016 construction contract. Testing performed and included in this report included testing of concrete cores for compressive strength and presence of chlorides; petrographic analysis of the concrete cores for concrete quality; lead testing of Span 7; and non-destructive GPR (Ground Penetrating Radar) testing of the concrete bridge deck. The results and testing reports have been provided.

In 2021, an Aerial infrared thermography (aerial IR) survey was carried out to evaluate the condition of the bridge deck. The report has been provided.

In late 2023-early 2024 after the bridge closure, BDI provided nondestructive testing and evaluation of the post-tension girders utilizing ground penetrating radar (GPR), ultrasonic tomography (MIRA), selected coring, and physical / chemical testing for the investigation. The testing was intended to determine the grout condition of the post-tension ducts, condition of the surrounding structural concrete, and to locate areas of potential for deterioration. BDI, also provided real time vibration monitoring services for displacement during the non-destructive testing and repairs of Bridge 700. The BDI Nondestructive Evaluation of Post-Tensioned Ducts and Structural Concrete report, dated February 21, 2024, have been provided.

7. In reference to AMENDED COMPLAINT, ¶ 91, identify whether the BTC addressed the existence of problems relating to the tie-down rods at Piers 6 and 7 and called for repairs to the post-tensioning systems of the WASHINGTON BRIDGE. If so, please identify the specific BTC plan sheet number(s) and describe in detail the work the BTC required the JV to perform on the tie-down rods at Piers 6 and 7 and the WASHINGTON BRIDGE'S post-tensioning systems.

RESPONSE: In RFP Part 2, Section 3.13.7.1 Washington Bridge Rehabilitation, “The overall goal of this project is to provide a 25-year design life for the rehabilitated structure; therefore, the DB Entity shall design and construct the bridge strengthening and rehabilitation with a minimum design life of 25 years.” The same section also goes on to state “The Design Build Team is responsible for any required retrofit or strengthening required by their proposal to achieve the 25-year design life. The DB Entity shall develop models and prepare design calculations as necessary to show their proposed method or rehabilitation will achieve this requirement.”

FIRST SUPPLEMENTAL RESPONSE:

RFP Part 1, Section 3.1 states in part, the following:

“The BTC includes but is not limited to: partial bridge demolition, bridge rehabilitation, bridge construction, roadway construction and reconstruction, retaining wall construction, drainage construction, landscaping construction, temporary and permanent utility relocation, handling and disposing of contaminated materials, and modification to and installation of traffic signals. The major features of the BTC design are as follows:

1. Construction of a new off-ramp from I-195 Westbound to Waterfront Drive.
2. Construction of a new bridge structure to carry traffic from the Taunton Avenue and Veterans Memorial Parkway on-ramps over the new off-ramp to Waterfront Drive. This will be RIDOT bridge number 126701 – Waterfront Drive off-ramp bridge.
3. Rehabilitation of the Washington Bridge No. 700 structure which carries I-195 westbound over the Seekonk River and local roadways. Work includes but is not limited to joint replacement, joint elimination, installation of link slabs, bridge rail replacement, partial and full depth bridge deck repairs, steel repairs, replacement of steel diaphragms, painting of steel, concrete superstructure and substructure repairs and jacking of girders to facilitate said repairs, beam strengthening (FRP), installation of deck-over-backwalls, replacement of sub-pavement drains and installation of waterproof membrane, repaving and restriping, concrete spandrel wall repairs, crack repair and sealing, pier strengthening (FRP), relocation of historically significant bridge pylon, modifications to and potential replacement of manholes, cleaning of drainage systems, concrete sealing and coating, rehabilitation of overhead sign supports and highway lighting, removal of contaminated debris (pigeon guano), installation of protective screening, and partial widening of spans 1 thru 4 to provide 5 continuous lanes of I-195 westbound traffic over the bridge. This partial widening will require the construction of new substructure units, including one in the Seekonk River.

4. Construction of a new bridge structure to carry traffic from Gano Street onto I-195 Westbound. This will be RIDOT bridge number 126601 – Gano St. on-ramp bridge.
5. Construction of new retaining walls to support the embankments around the two new bridge structures (126601 & 126701) and the new off-ramp to Waterfront Drive.
6. Construction of stormwater BMPs to meet permitting agency approvals.
7. Restriping of I-195 westbound from the Broadway overpass to the new Waterfront Drive off-ramp to allow four (4) lanes of through traffic on the mainline.

Following award of the Contract, the BTC (as modified to incorporate any ATCs accepted by the State), any other Proposal presented and accepted, and any commitment made in a Proposer's Proposal will become Contractual obligations of the Proposer if it should obtain the Contract.

RFP Part 2, Section 2.1 went on to explain to all proposers their responsibility in ensuring the accuracy and feasibility of completing the BTC as outlined by RIDOT. Specifically, the RFP Part 2, Section 1 stated:

“The DB Entity shall have full responsibility for completing the final design of all Project elements and acknowledges that it shall be the Engineer of Record for the final design, with the exception of the items listed in Section 2.2. The DB Entity acknowledges by receipt of such plans that it explicitly understands that while these plans have been advanced to a certain/preliminary level, the DB Entity shall be required to provide a final, complete Project design stamped, sealed and certified by its own Professional Engineers of Record, Licensed and Registered in the State of Rhode Island and Providence Plantations.

The preliminary plans, specifications, calculations, reports and comments provided as part of the BTC constitute that BTC and provide both the State's design baseline and minimum requirements. The DB Entity shall diligently review and verify the State-supplied Design (BTC) for errors, omissions, inconsistencies or other defects. The BTC within this RFP shall be incorporated into the final design by the DB Entity. The DB Entity shall promptly notify the State of any errors, omissions, inconsistencies, or other defects it discovers therein.

By submitting a Proposal, the DB Entity acknowledges that the State-supplied Design documentation presents a feasible concept for the Project which can and shall be used as the basis for the completion of the Project. The DB Entity also acknowledges that the Project can be completed within the schedule, timeframes and milestone durations specified elsewhere in

this RFP, and agrees that it shall have no right to seek additional Contract time or compensation in relations to such matters, except as specifically permitted by negotiated Project changes.

RFP Part 2, Section 3.13.7.1 further noted, "The overall goal of this project is to provide a 25-year design life for the rehabilitated structure; therefore, the DB Entity shall design and construct the bridge strengthening and rehabilitation with a minimum design life of 25 years." The same section also goes on to state, "The Design Build Team is responsible for any required retrofit or strengthening required by their proposal to achieve the 25-year design life. The DB Entity shall develop models and prepare design calculations as necessary to show their proposed method or rehabilitation will achieve this requirement."

Lastly, RFP Parts 1 and 2 referenced historical documents related to the Washington Bridge and attached them as Appendix A. It was incumbent upon the Proposer to examine the historical documents to ensure satisfactory performance of its contracted obligations and to inform RIDOT if there was any prohibition to performance under the contract due to errors and/or omissions in the BTC.

SEE BATES RIDOT_000124861-RIDOT_000132445.

SECOND SUPPLEMENTAL RESPONSE: See Bates: RFP PART 1-3 RIDOT_000228753-00022890; Appendix A: RIDOT_000228678-RIDOT_000228752; Appendix B: RIDOT_000125448-RIDOT_000131848; Appendix C: RIDOT_000230821- RIDOT_000230836

THIRD SUPPLEMENTAL RESPONSE: Corrected BATES for RFP PART 1-3: RIDOT_000230837 - RIDOT_000231126

FOURTH SUPPLEMENTAL RESPONSE: Plaintiff supplements its prior response as follows. Plaintiff states that the BTC did not specifically identify structural deficiencies with the tie-down rods or prestressed concrete beams at Piers 6 and 7 of the Washington Bridge, as reflected in Plaintiff's supplemental response to Request for Admission No. 15. Plaintiff further states that the BTC did not specifically identify structural deficiencies with the post-tensioning system of the Washington Bridge, as reflected in Plaintiff's supplemental response to Request for Admission No. 16. Plaintiff also states, consistent with Plaintiff's supplemental response to Request for Admission No. 17, that good engineering practice, which was a requirement of the BTC, dictated a visual examination that would have revealed the necessity of any required retrofit or remediation

Notwithstanding the foregoing, the 2021 RFP and BTC imposed obligations on the DB Entity and Design Build Team that included, but were not limited to, final design responsibility, review and verification of the State-supplied BTC, identification of errors, omissions, inconsistencies, or defects, and completion of a final, stamped, sealed, and certified design by the DB Entity's own Professional Engineers of Record. The RFP further provided that the preliminary plans, specifications, calculations, reports, and comments supplied as part of the BTC constituted the State's design baseline and minimum requirements, that the DB Entity was required to incorporate the BTC into the final design, and that the DB Entity was required to notify the State of any errors, omissions, inconsistencies, or other defects discovered in the BTC.

The RFP also required the DB Entity to design and construct the bridge strengthening and rehabilitation to provide a minimum 25-year design life for the rehabilitated structure. The RFP further provided that the Design Build Team was responsible for any required retrofit or strengthening required by its proposal to achieve the 25-year design life, and that the DB Entity was required to develop models and prepare design calculations as necessary to show that its proposed method of rehabilitation would achieve that requirement. The 2021 RFP also required proposers to base their proposals on the BTC, incorporate the BTC except as modified through accepted ATCs, and treat accepted proposal commitments and the BTC as contractual obligations after award.

The BTC scope for Washington Bridge No. 700 included rehabilitation work, concrete superstructure and substructure repairs, jacking of girders to facilitate repairs, beam strengthening, pier strengthening, crack repair and sealing, and other bridge rehabilitation work. The RFP further stated that the DB Entity was responsible for the complete design, detailing, and construction of each new and rehabilitated bridge, and that the scope included design and construction related to rehabilitation of Washington Bridge North No. 700. The RFP also stated that the DB Entity was to perform concrete repairs and crack sealing for the existing structure to remain and be reused, including drop-in beams, precast beams, cantilevers, substructures, spandrel walls, and other concrete items. The RFP further identified, among other work, adjustment, replacement, and/or removal of seismic longitudinal restrainers, end diaphragms, anchor rods, bearings, pedestals, and related items as deemed necessary by the DB Entity's design.

Accordingly, Plaintiff is not presently identifying a BTC plan sheet that specifically called out structural deficiencies in the tie-down rods at Piers 6 and 7 or the post-tensioning system by plan sheet number. Rather, Plaintiff states that the BTC and RFP imposed on the JV and its design team the responsibility to review, verify, evaluate, design, strengthen, retrofit, and remediate as necessary to deliver the Washington Bridge rehabilitation with the required 25-year design life. The historical documents related to the Washington Bridge were referenced in RFP Parts 1 and 2 and attached as Appendix A, and it was incumbent on the Proposer to examine those historical documents to ensure satisfactory performance of its

contractual obligations and to inform RIDOT if any errors or omissions in the BTC prohibited performance under the Contract.

See Bates RFP Part 1-3: RIDOT_000230837-RIDOT_000231126; Appendix A: RIDOT_000228678-RIDOT_000228752; Appendix B: RIDOT_000125448-RIDOT_000131848; Appendix C: RIDOT_000230821-RIDOT_000230836.

8. Is YOUR response to each request for admission in the JV's First Requests for Admissions to RIDOT, dated June 13, 2025, an unqualified admission? If not, for each response that is not an unqualified admission:
- a. State the number of the request;
 - b. State all facts on which you base YOUR response.
 - c. State the names, addresses, and telephone numbers of all persons who have knowledge of those facts; and
 - d. Identify all DOCUMENTS and other tangible things that support YOUR response and state the name, address, and telephone number of the person who has each DOCUMENT or thing.

RESPONSE: See RFA Responses.

FIRST SUPPLEMENTAL RESPONSE: Please see below.

- **8(a): 2- 4, 18-19**
- **8(b): See BATES RIDOT_000124861-RIDOT_000132445; RIDOT_000134218- RIDOT_000134482.**
- **8(c): Loren Doyle, John Preiss, Anthony Pompei
Rhode Island Department of Transportation
Two Capitol Hill
Providence RI 02903
Tel: (401) 563-4590
Fax: (401) 222-4226**

**Christopher Hart, Corey Richards, Richard Prior
AECOM
10 Orms St #405,
Providence, RI 02904
(401)521-2730**
- **8(d): Please See BATES produced for ROG 8(b).**

SECOND SUPPLEMENTAL RESPONSE:

- 8(a): 1-8; 11-16; 25-28;
- 8(b):
 - o ROG's 1-16, See Bates: RIDOT_000124861-RIDOT_000132445; RIDOT_000134218-RIDOT_000134482;RIDOT_000230837-RIDOT_000231126
 - o ROG 25 – RIDOT_000000001- RIDOT_000242007
 - o ROG 26 – See BATES: RIDOT_000124861-RIDOT_000132445; RIDOT_000134218-RIDOT_000134482;RIDOT_000230837-RIDOT_000231126
- 8(d):
 - o See All BATES Responsive to 8(b).
 - o The State will produce supportive documents responsive to interrogatories 27-48 with our supplemental production to be produced by February 6, 2026.

THIRD SUPPLEMENTAL RESPONSE:

- 8(a): 1-8; 11-16; 25-28;
- 8(b):
 - o RFA's 1-16, See Bates: RIDOT_000124861-RIDOT_000132445; RIDOT_000134218-RIDOT_000134482;RIDOT_000230837-RIDOT_000231126
 - o RFA 25 – RIDOT_000000001- RIDOT_000242007
 - o RFA 26 – See BATES: RIDOT_000124861-RIDOT_000132445; RIDOT_000134218-RIDOT_000134482;RIDOT_000230837-RIDOT_000231126
- 8(d):
 - o See All BATES Responsive to 8(b).
 - o RIDOT_000295232-RIDOT_000299793

FOURTH SUPPLEMENTAL RESPONSE:

Plaintiff supplements its prior response as follows. Subject to and without waiving Plaintiff's objections, Plaintiff states that its responses to the JV's First Requests for Admissions dated June 13, 2025 that are not unqualified admissions include Requests for Admission Nos. 1-8, 11-19, 21, 23-48, and, to the extent Defendants contend that an explanatory admission is not an unqualified admission, Request for Admission No. 20.

With respect to Requests for Admission Nos. 1-4, Plaintiff's responses are based on the facts that RIDOT did not include certain information, certain post-tensioning-system test results, in the 2021 RFP, but relevant information was available to proposers upon request, and the 2021 RFP placed responsibility on proposers to inform themselves about conditions that could affect performance of contractual obligations. Plaintiff further states that RIDOT contracted with and relied upon expert contractors, including the JV, to identify and request any additional information from RIDOT or other sources necessary to fulfill their contractual obligations.

With respect to Requests for Admission Nos. 5-8 and 11-17, Plaintiff's responses are based on the 2021 RFP, the BTC, the Design-Build Contract requirements, the DB Entity's final-design and Engineer-of-Record obligations, the ability of proposers to submit Alternate Technical Concepts, and the obligation to review and verify the State-supplied BTC for errors, omissions, inconsistencies, or other defects. Plaintiff's responses are further based on the RFP requirement that the DB Entity design and construct bridge strengthening and rehabilitation with a minimum 25-year design life and be responsible for any required retrofit or strengthening required by its proposal to achieve that design life. Plaintiff's responses to Requests for Admission Nos. 15-17 are further based on the State's position that, while the BTC did not specifically identify structural deficiencies with the tie-down rods, prestressed concrete beams at Piers 6 and 7, or post-tensioning system, good engineering practice required a thorough assessment of the bridge, its original design, all subsequent reports, inspections, and recommendations for repair before undertaking contractual obligations relating to repairs, replacement, or demolition.

With respect to Requests for Admission Nos. 18, 19, and 21, Plaintiff's responses are based on the language of the VN Assessment of the Type-D Cantilever Beam Post-Tensioning System on the I-195 Westbound Washington Bridge, including the statement that, as of February 26, 2024, the repairs and strengthening required to address documented deterioration and deficiencies along the structure were significant, had limited viability, and had associated risks, and that fully eliminating those risks and improving inspection, maintenance, and repair access would require demolition and replacement of the superstructure and potentially full bridge replacement. Plaintiff's responses are further based on the fact that, after December 11, 2023, RIDOT retained contractors to evaluate the rehabilitation viability of the subject bridge.

With respect to Request for Admission No. 20, Plaintiff's response is based on the fact that RIDOT admitted that, between January 1, 2013 and December 11, 2023, it did not assess through GPR or other radiographic testing whether the Washington Bridge could be viably rehabilitated, while also stating that reliance on GPR or further testing would have resulted from contractors indicating that such testing was needed.

With respect to Requests for Admission Nos. 23 and 24, Plaintiff's responses are based on the fact that the requests were vague and ambiguous because they did not identify the specific statement, speaker, context, or meaning of the referenced "reconstruction project" with sufficient clarity for Plaintiff to admit or deny the requests as phrased.

With respect to Request for Admission No. 25, Plaintiff's response is based on Plaintiff's denial that RIDOT determined to demolish and replace the Washington Bridge based upon the results of the GPR, MIRA, and other testing performed after December 11, 2023.

With respect to Request for Admission No. 26, Plaintiff's response is based on Plaintiff's position that the RFP process required consultants, including AECOM, to perform any required testing to generate the RFP, and that the RFP required the Design Build team to perform any independent analysis necessary to advance the BTC to a minimum 25-year design life, which may have included, but was not limited to, the type of post-closure testing that was later performed.

With respect to Requests for Admission Nos. 27-48, Plaintiff's responses are based on Plaintiff's denials of the asserted vehicle-weight and bridge-weight factual predicates set forth in those requests.

For persons with knowledge, Plaintiff identifies, without limitation, Loren Doyle, John Preiss, and Anthony Pompei, Rhode Island Department of Transportation, Two Capitol Hill, Providence, Rhode Island 02903, Tel: (401) 563-4590, Fax: (401) 222-4226. Plaintiff further identifies Christopher Hart, Corey Richards, and Richard Prior, AE COM, 10 Orms St #405, Providence, Rhode Island 02904, Tel: (401) 521-2730. Plaintiff further identifies the authors, recipients, custodians, and persons identified in or associated with the documents cited in Plaintiff's RFA responses and the Bates ranges identified below.

For documents, Plaintiff identifies the documents previously identified in response to this Interrogatory, including Bates RIDOT_000124861-RIDOT_000132445, RIDOT_000134218-RIDOT_000134482, and RIDOT_000230837-RIDOT_000231126 for Requests for Admission Nos. 1-8 and 11-16.

Plaintiff further identifies Bates RIDOT_000000001-RIDOT_000242007 for Request for Admission No. 25.

Plaintiff further identifies Bates RIDOT_000124861-RIDOT_000132445, RIDOT_000134218-RIDOT_000134482, RIDOT_000230837-RIDOT_000231126, and RIDOT_000295232-RIDOT_000299793, see previously produced production 18 for Requests for Admission Nos. 26-48. Plaintiff further identifies all documents cited in, referenced by, or supporting Plaintiff's responses and supplemental responses to the JV's First Requests for Admissions dated June 13, 2025.

I, Loren Doyle, under the pains and penalty of perjury, declare that the foregoing is true based upon matters within my personal knowledge and information that has been assembled and provided to me and that the answers provided are correct, according to the best of my knowledge.

Loren Doyle
By: Loren Doyle

Dated: 6/9/26

STATE OF RHODE ISLAND
COUNTY OF PROVIDENCE

On this 9th day of June, 2026, before me, the undersigned notary, personally appeared Loren Doyle personally known to the notary, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his knowledge.

M. C. Beltram
NOTARY PUBLIC
My commission expires: 5/21/2028
Notary identification number: 54513



As to Objections,
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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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of June 2026, I electronically 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