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May 1, 2025

Via Certified Mail (#9589 0710 5270 2449 8805 92)
and Electronic Mail to cstaff1@crmc.ri.gov and council@crmc.ri.gov

Chairman Raymond C. Coia
Coastal Resources Management Council
Stedman Government Center, Suite 3
4808 Tower Hill Road
Wakefield, RI 02879-1900

Before the Rhode Island Coastal Resources Management Council
In the Matter of: TSL, LLC
CRMC File 2023-08-084; RIDEM Water Quality Certification Number 24-008 (MPL Only)

Stone Harbour Condominium Association Witness List

Chairman Coia:

Moses Ryan Ltd. writes on behalf of our client the Stone Harbour Condominium Association ("Stone Harbour") regarding the above-referenced application by TSL, LLC (the "Application" or "Proposal"). We write to provide Stone Harbour's enclosed list of expert and lay witnesses expected to testify at the scheduled May 13 hearing on the Proposal.

Pursuant to Management Procedures (650-RICR-10-00-1) Section 1.5.9(A), witness lists are due from parties after completion of the CRMC staff report and not less than seven (7) business days prior the scheduled hearing. Although we have not received a copy of the CRMC staff report for this Proposal, we are submitting the enclosed witness list out of an abundance of caution to remain compliant with Section 1.5.9(A). As such, we reserve the right to amend our witness list as necessary and also reserve the right to provide any new evidence, reports, or data.

Thank you for your attention to this matter.

Sincerely,

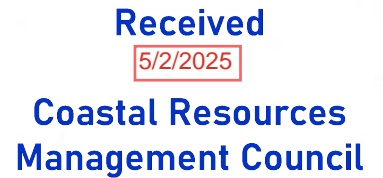
Thomas V. Moses, Esq.

*cc via electronic mail: Attorney Seth Handy, Counsel to TSL, LLC
CRMC Executive Director Jeffrey Willis
Mr. Justin Wolf Skenyon, CRMC
Attorney Anthony Desisto, Counsel to CRMC*



Enclosures: Stone Harbour Condominium Association Witness List

Before the Rhode Island Coastal Resources
Management Council



In the Matter of: TSL, LLC

Witness List

CRMC File 2023-08-084

Pursuant to CRMC Management Procedures 650-RICR-10-00-1 Section 1.5.9(a), the following witnesses are expected to testify on behalf of the Stone Harbour Condominium Association at the hearing in the matter of: TSL, LLC regarding installation of a berthing facility and expansion of existing marina for the mooring of a pool boat for recreational purposes:

1. Expert Witnesses

- a. Mark W. Tebbets, MCP, CBO
New England Code Consulting
Subject Matter: Building, Fire, and Electrical Code compliance and Americans with Disabilities Act compliance of the proposal
- b. Jack Ryan, AIA
Jack Ryan Architect
Subject Matter: Americans with Disabilities Act compliance of proposal
- c. Richard L. Pastore P.E.
RP Engineering, Inc.
Subject Matter: Engineering and regulatory compliance of proposal

2. Lay Witnesses

- a. Howard Sutton
President, Stone Harbour Condominium Association
Subject Matter: Impacts to the surrounding area

The Stone Harbour Condominium Association reserves the right to amend this list, to provide any new evidence, reports, or data, and to call any additional witnesses as necessary.

Respectfully submitted,

**Stone Harbour Condominium
Association,
By its Attorneys,**



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Dated: May 1, 2025

