

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

DEFENDANT VANASSE HANGEN BRUSTLIN, INC.’S FIRST SET OF INTERROGATORIES TO STEERE ENGINEERING, INC.

NOW COMES Defendant, Vanasse Hangen Brustlin, Inc. (“VHB”), by and through counsel, Lewis Brisbois Bisgaard & Smith LLP, and propounds the following interrogatories to be answered by the Defendant, Steere Engineering, Inc. (“SEI”), under oath pursuant to Rule 33 of the Rhode Island Rules of Civil Procedure. These interrogatories shall be deemed to seek answers as of the date hereof but shall be deemed to be continuing so that any additional information relating in any way to these interrogatories which SEI shall acquire or which becomes known to SEI up to and including the time of trial shall be furnished to VHB promptly after such information is acquired or becomes known. SEI shall answer each question

separately and fully in writing and under oath within 40 days after receipt to SEI or its counsel.

If SEI objects to any question, it must note its objection and state the reason therefore.

INSTRUCTIONS

1. Each answer, statement or objection shall be preceded by the interrogatory to which it responds.
2. When an objection is made to any interrogatory or subpart thereof, it shall state with specificity all grounds upon which the objecting party relies.
3. If an interrogatory is objected to on the ground of attorney-client privilege or on the ground of attorney-work product or that the information requested was obtained to prepare in anticipation of litigation or for trial, sufficient information must be provided (i) to permit the subject matter, but not content, of the allegedly privileged information to be identified with sufficient specificity to allow a party to determine whether a motion to compel is warranted; and (ii) to explain the basis for the claim of privilege in order that a court can properly determine its propriety.
4. These interrogatories require supplemental or amended answers to the extent required by Rule 33 of the Rhode Island Rules of Civil Procedure.

DEFINITIONS

The full text of the following definitions is deemed incorporated by reference and to all discovery requests:

1. Communication. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
2. “Document” or “Documents” as used herein means, without limitation, the following items, printed or recorded or reproduced by any other mechanical process, or written or produced by hand: daily reports, logs, photographs, tapes, agreements, drafts of agreements, communications, correspondence, telegrams, internal or other memoranda, summaries or records of telephone conversation, diaries, graphs, films, reports, notebooks, note charts, plans, drawings, sketches, summaries of records of personal conversations, interviews, meetings or conferences, summaries of reports of investigations or negotiations, opinions or reports of consultants, letters, computer output or input, invoices and other writings, including e-mails.
3. Identify or Identity (With Respect to Persons). When referring to a person, “to

identify” or to provide the “identity” means to give, to the extent known, the person’s full name, present or last known address, and, when referring to a natural person, the present or last known place of employment. Once a person has been identified in accordance with the subparagraph, only the name of the person need be listed in response to subsequent discovery requesting the identification of that person.

4. Identify (with Respect to Documents). When referring to documents, “to identify” means to give, to the extent known, the
 - a) type of document;
 - b) general subject matter;
 - c) date of the document; and
 - d) author(s), addressee(s), and recipient(s).
5. “Describe in detail” as used herein includes a request for a complete description and explanation of the facts, circumstances, analysis, opinion and other information relating to the subject matter of a specific interrogatory.
6. Parties. The term “parties,” where applicable, refers to Plaintiffs and all named Defendants, including third and fourth party Defendants.
7. Person. The term “person” is defined as any natural person or any business, legal, or governmental entity or association.
8. Concerning. The term “concerning” means referring to, describing, evidencing, or constituting.
9. State the basis. When an interrogatory calls upon a party to “state the basis” of or for a particular claim, assertion, allegation, or contention, the party shall:
 - a) identify each and every document (and, where pertinent, the section article, or subparagraph thereof), which forms any part of the source of the party’s information regarding the alleged facts or legal conclusions referred to in the interrogatory;
 - b) identify each and every communication which forms any part of the source of the party’s information regarding the alleged facts or legal conclusions referred to by the interrogatory;
 - c) state separately the acts or omissions of any person (identifying the acts or omissions by stating their nature, time, and place and identifying the persons involved) which form any part of the party’s information regarding the alleged facts or legal conclusions referred to in the interrogatory; and state separately any other fact which forms the basis of the party’s information

regarding the alleged facts or conclusions referred to in the interrogatory.

10. The term “Plaintiff”, or “State” shall mean the Plaintiff, State of Rhode Island and/or its agents and all other persons acting on its behalf.
11. The term “SEI”, “you” or “your” shall mean the Defendant, Steere Engineering, Inc. and/or its agents and all other persons acting on its behalf.
12. The term “VHB” refers to the defendant, Vanasse Hangen Brustlin, Inc.
13. The term “Bridge 700” refers to I-195 westbound Washington Bridge in Rhode Island, formally known as the Washington Bridge North No. 700.
14. The term “Complaint” refers to the civil complaint filed by the State of Rhode Island v. AECOM Technical Services, Inc., et al. in Providence Superior Court, Civil Action No. PC-2024-04526.

INTERROGATORIES

1. For each individual(s) who assisted in preparing the answers to these interrogatories, identify each individual and following the identity of each individual, list the number of each interrogatory for which that individual provided assistance.

2. Identify each person whom you expect to call as an expert witness at trial; following the identity of such expert witness, with the subject matter in which the expert is expected to testify, the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.

3. Identify each person whom you intend to call as a witness at trial.

4. Identify each document you intend to introduce as an exhibit at the trial of this matter.

5. Identify each person who has been a witness to any alleged wrongdoing set forth in the Complaint or upon which the Complaint is founded and provide a brief description of the occurrence, event, circumstance or communication witnessed.

6. Identify each person who has knowledge of the facts and circumstances pertaining to the allegations in the Complaint, and for each, state the general nature of the facts and circumstances about which the person has knowledge.

7. If you have obtained any signed or unsigned statements, whether recorded or written, of any witnesses or other persons who have (or may have) knowledge of any facts in the Complaint, please state:

- a. the name, address and telephone number of each such person;
- b. the date the statement was made/given;
- c. to whom the statement was made/given;
- d. the persons present when the statement was made/given or any witnesses to any signed, written statement;
- e. whether the statement is written or verbal (and recorded or transcribed in some manner);
- f. the person(s) with possession, custody or control of the written statement(s) or any notes, recording(s) or transcription(s) of any verbal statement(s); and
- g. please attach a copy of each written statement identified in this interrogatory.

8. Describe in full and complete detail the substance of any and all conversations you have had with Plaintiff relative to any alleged wrongdoing set forth in the Complaint or upon which the Complaint is founded.

9. Describe in full and complete detail your defenses to Plaintiff's claims against you as set forth in the Complaint.

10. Describe in full and complete detail the decision in or around 2013 to rehabilitate the Bridge versus demolish and rebuild it.

11. Describe in full and complete detail your scope of services and/or work relative to the Bridge from the time of the Bridge's original construction to present, including but not limited to by identifying any and all contracts that set forth your scope of services.

12. Describe in full and complete detail your scope of services and/or work relative to the Bridge's post-tensioned cantilever beams, including but not limited to inspection of same, from the time of the Bridge's original construction to present.

13. Describe in full and complete detail your scope of services and/or work relative to the Bridge's tie down rods, including but not limited to inspection of same, from the time of the Bridge's original construction to present.

14. Identify any and all of employees and/or agents who have performed services relative to the Bridge and/or worked on the Bridge on your behalf and following the identification of each such individual, state (1) if they are currently employed by you and, if not their last known address and phone number, and (2) the scope of services and/or work such individual performed.

Respectfully submitted,

VANASSE HANGEN BRUSTLIN, INC.

By and through Counsel:

/s/ Brian C. Newberry, Esq.

Brian C. Newberry, Esq. (#5542)

Amanda E. Mathieu, Esq., *pro hac vice* (pending)

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Date: November 12, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the Odyssey File & Serve System, will be sent electronically to the registered participants as identified on the Case Service Contacts List and/or paper copies will be sent, postage pre-paid, to those indicated as non-registered participants on this 12th day of November, 2024. The document is further available for viewing and/or downloading from the System.

/s/ Brian C. Newberry, Esq.

Brian C. Newberry, Esq.

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