

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 REQUEST FOR PRODUCTION OF DOCUMENTS TO PRIME AE GROUP, INC.**

Pursuant to Rule 34 the Rhode Island Rules of Civil Procedure, Defendant, Vanasse Hangen Brustlin, Inc. (“VHB”), by and through counsel, Lewis Brisbois Bisgaard & Smith LLP, hereby requests that Defendant, PRIME AE Group, Inc. (“PRIME AE”), produce for inspection and copying true copies of the following documents in their possession, custody or control, within forty (40) days at the office of Lewis Brisbois Bisgaard & Smith LLP, One Citizens Plaza # 1120, Providence, RI 02903.

## DEFINITIONS AND INSTRUCTIONS

1. As to documents responsive to these requests for which you claim a privilege, or which you claim are not subject to production, please provide a list describing each such document, and stating with respect to each document:

- (a) the type of document (e.g., letter, memorandum, e-mail, etc.);
- (b) the date of the document;
- (c) the title of the document;
- (d) the author(s) of the document;
- (e) the intended and actual recipients of the document;
- (f) the general subject matter of the document; and
- (g) the factual and/or legal bases for the claim of privilege or ground for non-production with respect to the document.

2. If any responsive document was in your possession, custody, or control but has since been disposed of, lost, discarded, destroyed, or sent to another party, please identify: (i) each document, specifying its author, addressee, date, subject matter and all persons to whom copies were furnished; (ii) the contents of the document; (iii) when the document was in your possession, custody, or control, including the date or approximate time of the disposition, the reason for the loss, destruction, disposal, or sending away and who made such a decision; (iv) the former custodian of the document; (v) the present location of the document; (vi) the present custodian, and (vii) any other reasons and circumstances why such records no longer exist.

3. This demand is to include all after acquired documents of the type made reference to in the request. PRIME AE is therefore requested to update the production of documents by forwarding copies to VHB or putting VHB on notice as to any such newly acquired material.

4. The term “communication” means all oral conversations, discussions, letters, telegrams, memoranda, meetings, conferences, discussions, notes, internal memoranda, email, voicemail, facsimile, and any transmission of information in any form, both oral and written.

5. The term “concerning” means referring to, relating to, describing, evidencing, or constituting.

6. The term “document” means, without limitation, all items printed, recorded, reproduced by any mechanical process, written or produced by hand, including but not limited to: legal documents, daily reports, logs, photographs, tapes, agreements, drafts of agreements, business records, interoffice communications, correspondence, telegrams, internal or other memoranda, summaries or records of telephone conversations, telegrams, diaries, graphs, films, reports, notebooks, note charts, plans, drawings, sketches, maps, summaries of records of personal conversations, interviews, meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, letters, invoices, and data stored electronically, including but not limited to email, voicemail, floppy disks, hard drives, CD-ROM and deleted and erased computer records, which are in the possession or control of the answering party.

7. The term “person” means any natural person or any business, legal, or governmental entity or association.

8. 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.

9. The term “PRIME AE”, “you” or “your” shall mean the defendant, PRIME AE Group, Inc. and/or its agents and all other persons acting on its behalf.

10. The term “VHB” refers to the defendant, Vanasse Hangen Brustlin, Inc.

11. The term “Bridge 700” refers to I-195 westbound Washington Bridge in Rhode Island, formally known as the Washington Bridge North No. 700.

12. 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.

## **REQUESTS**

### **REQUEST NO. 1**

All documents upon which you rely in support of your defenses to the claims made in the Complaint.

### **REQUEST NO. 2**

Any and all documents concerning the allegations made in the Complaint.

### **REQUEST NO. 3**

Any and all documents which you relied upon and/or referenced in your answers to VHB’s First Set of Interrogatories to PRIME AE.

### **REQUEST NO. 4**

Any and all documents which evidence, reflect or reference any communications, including, without limitation, reports, tape recordings, minutes, transcripts, correspondence, memoranda, notes, or transmittals, and emails by and between you and any other person or entity concerning the events referred to in the Complaint.

### **REQUEST NO. 5**

Any and all documents that you intend to introduce as exhibits at the trial of this action.

### **REQUEST NO. 6**

The resume or curriculum vitae of each expert witness whom you intend to call at the trial of this action.

**REQUEST NO. 7**

Any and all documents provided to, to be provided to, prepared by and/or relied upon by your experts in this action.

**REQUEST NO. 8**

Any and all written statements and/or reports, signed or unsigned, of any and all expert witnesses, retained by you with regard to the allegations contained in the Complaint.

**REQUEST NO. 9**

Any and all written statements or reports, signed or unsigned, of any and all witnesses to the events alleged in the Complaint, and copies of all written transcriptions of any statements of such witnesses taken on a recording instrument.

**REQUEST NO. 10**

Any and all documents relating to, referring to, or evidencing communications between you and VHB concerning the allegations contained in the Complaint.

**REQUEST NO. 11**

Any and all documents relating to, referring to, or evidencing communications between you and Plaintiff concerning the allegations contained in the Complaint.

**REQUEST NO. 12**

Any and all documents relating to, referring to, or evidencing communications between you and AECOM Technical Services, Inc. concerning the allegations contained in the Complaint.

**REQUEST NO. 13**

Any and all documents relating to, referring to, or evidencing communications between you and Aetna Bridge Company concerning the allegations contained in the Complaint.

**REQUEST NO. 14**

Any and all documents relating to, referring to, or evidencing communications between you and Aries Support Services, Inc. concerning the allegations contained in the Complaint.

**REQUEST NO. 15**

Any and all documents relating to, referring to, or evidencing communications between you and Barletta Heavy Division, Inc. concerning the allegations contained in the Complaint.

**REQUEST NO. 16**

Any and all documents relating to, referring to, or evidencing communications between you and Barletta/Aetna I-195 Washington Bridge North Phase 2 JV concerning the allegations contained in the Complaint.

**REQUEST NO. 17**

Any and all documents relating to, referring to, or evidencing communications between you and Collins Engineers, Inc. concerning the allegations contained in the Complaint.

**REQUEST NO. 18**

Any and all documents relating to, referring to, or evidencing communications between you and Commonwealth Engineers & Consultants, Inc. concerning the allegations contained in the Complaint.

**REQUEST NO. 19**

Any and all documents relating to, referring to, or evidencing communications between you and Jacobs Engineering Group, Inc. concerning the allegations contained in the Complaint.

**REQUEST NO. 20**

Any and all documents relating to, referring to, or evidencing communications between you and Michael Baker International, Inc. concerning the allegations contained in the Complaint.

**REQUEST NO. 21**

Any and all documents relating to, referring to, or evidencing communications between you and Steere Engineering, Inc. concerning the allegations contained in the Complaint.

**REQUEST NO. 22**

Any and all documents relating to, referring to, or evidencing communications between you and Transystems Corporation concerning the allegations contained in the Complaint.

**REQUEST NO. 23**

All documents concerning any communications, meetings or discussions (including, without limitation, correspondence, e-mails, notes and internal memoranda), that occurred between you and any party in this case.

**REQUEST NO. 24**

All documents concerning the damages that you have allegedly sustained as a result of the allegations contained in the Complaint.

**REQUEST NO. 25**

All photographs, films, diagrams, videotapes, depictions or any other documents concerning the allegations in the Complaint.

**REQUEST NO. 26**

Any and all documents which you have received from any person or entity regarding the allegations in the Complaint.

**REQUEST NO. 27**

Any and all documents concerning the decision in or around 2013 to rehabilitate the Bridge versus demolish and rebuild it.

**REQUEST NO. 28**

Any and all documents concerning your scope of services and/or work relative to the Bridge, including but not limited to with respect to post-tensioned cantilever beams and/or tie down rods and the inspection of same, from the time of the Bridge's original construction to present.

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)

LEWIS BRISBOIS BISGAARD & SMITH, LLP

One Citizens Plaza, Suite 1120

Providence, RI 02903

Tel: (401) 406-3309

Fax: (401) 406-3312

[brian.newberry@lewisbrisbois.com](mailto:brian.newberry@lewisbrisbois.com)

[amanda.mathieu@lewisbrisbois.com](mailto:amanda.mathieu@lewisbrisbois.com)

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 12<sup>th</sup> 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.



**FOR THE STATE OF RHODE ISLAND:**

Sarah W. Rice, Esq.  
Stephen N. Provazza, Esq.  
Assistant Attorneys General  
150 S. Main Street  
Providence, RI 02903  
[srice@riag.ri.gov](mailto:srice@riag.ri.gov)  
[sprovazza@riag.ri.gov](mailto:sprovazza@riag.ri.gov)

Jonathan N. Savage, Esq.  
Michael P. Robinson, Esq.  
Edward D. Pare III, Esq.  
Alyssa L. Lemire, Esq.  
Savage Law Partners, LLP  
564 South Water Street  
Providence, RI 02903  
[js@savagelawpartners.com](mailto:js@savagelawpartners.com)  
[mrobinson@savagelawpartners.com](mailto:mrobinson@savagelawpartners.com)  
[epare@savagelawpartners.com](mailto:epare@savagelawpartners.com)  
[alemire@savagelawpartners.com](mailto:alemire@savagelawpartners.com)

**FOR THE DEFENDANTS:**

**AECOM Technical Services, Inc.**

Courtney Ann Richards, Esq.  
Wendy Venoit, Esq. (*pro hac vice*)  
Michael Filbin, Esq. (*pro hac vice*)  
COZEN O'CONNOR  
200 State Street, Suite 1105  
Boston, MA 02109  
[crichards@cozen.com](mailto:crichards@cozen.com)  
[wvenoit@cozen.com](mailto:wvenoit@cozen.com)  
[mfilbin@cozen.com](mailto:mfilbin@cozen.com)

Lawrence M. Prosen, Esq. (*pro hac vice*)  
COZEN O'CONNOR  
1200 19th Street, NW, Suite 300  
Washington, DC 20036  
[lprosen@cozen.com](mailto:lprosen@cozen.com)

**Aetna Bridge Company**

Michael A. Kelly, Esq.  
Jackson C. Parmenter, Esq.  
Sean P. Klammer, Esq.  
KELLY, SOUZA & PARMENTER, P.C.  
128 Dorrance Street, Suite 300  
Providence, RI 02903  
[mkelly@ksplawpc.com](mailto:mkelly@ksplawpc.com)  
[jparmenter@ksplawpc.com](mailto:jparmenter@ksplawpc.com)  
[sklammer@ksplawpc.com](mailto:sklammer@ksplawpc.com)

**Aries Support Services, Inc.**

Thomas W. Heald, Esq.  
HEALD LAW, LTD.  
One Turks Head Place  
76 Westminster Street, Suite 420  
Providence, RI 02903  
[tw@healdlaw.net](mailto:tw@healdlaw.net)

John F. Kelleher, Esq.  
Brent Davis, Esq.  
LaSalle & Kelleher P.C.  
One Turks Head Place  
Suite 450  
Providence, RI 02903  
[jkelleher@lasallekelleher.com](mailto:jkelleher@lasallekelleher.com)  
[bdavis@lasallekelleher.com](mailto:bdavis@lasallekelleher.com)

Paul Callaghan, Esq.  
Higgins, Cavanagh & Cooney, LLP  
10 Dorrance Street  
Suite 400  
Providence, RI 02903  
[pcallaghan@hcc-law.com](mailto:pcallaghan@hcc-law.com)

**Barletta Heavy Division, Inc.**

Jeffrey B. Pine, Esq.  
Lynch & Pine, LLC  
One Park Row, 5<sup>th</sup> Floor  
Providence, RI 02903  
[jpine@lynchpine.com](mailto:jpine@lynchpine.com)

Christopher D. Mellado, Esq. (*pro hac vice*)  
FOLEY & LARDNER, LLP  
301 E. Pine Street, Suite 1200  
Orlando, FL 32801  
[chris.mellado@foley.com](mailto:chris.mellado@foley.com)

Jeffrey Blease, Esq. (*pro hac vice*)  
FOLEY & LARDNER, LLP  
111 Huntington Ave., Suite 25  
Boston, MA 02199  
[jblease@foley.com](mailto:jblease@foley.com)

**Barletta/Aetna I-195 Washington Bridge North Phase 2 JV**

Jeffrey B. Pine, Esq.  
Lynch & Pine, LLC  
One Park Row, 5<sup>th</sup> Floor  
Providence, RI 02903  
[jpine@lynchpine.com](mailto:jpine@lynchpine.com)

Jackson C. Parmenter, Esq.  
KELLY, SOUZA & PARMENTER, P.C.  
128 Dorrance Street, Suite 300  
Providence, RI 02903  
[jparmenter@ksplaw.com](mailto:jparmenter@ksplaw.com)

**Collins Engineers, Inc.**

Richard M. Dighello, Jr., Esq.  
Updike, Kelly & Spellacy, PC  
225 Asylum Street, 20<sup>th</sup> Floor  
Hartford, CT 06103  
[rdighello@uks.com](mailto:rdighello@uks.com)

**Commonwealth Engineers & Consultants, Inc.**

Susan M. Silva, Esq.  
Peabody & Arnold LLP  
Federal Reserve Plaza  
600 Atlantic Avenue  
Boston, MA 02210  
[ssilva@peabodyarnold.com](mailto:ssilva@peabodyarnold.com)

**Jacobs Engineering, Inc.**

Michael R. Creta, Esq.  
K&L Gates LLP  
One Congress Street, Suite 2900  
Boston, MA 02115  
[michael.creta@klgates.com](mailto:michael.creta@klgates.com)

**Michael Baker International, Inc.**

Christopher C. Whitney, Esq.  
Katharine E. Kohm, Esq.  
Sheya A. Rivard, Esq.  
PIERCE ATWOOD LLP  
One Citizens Plaza, 10<sup>th</sup> Floor  
Providence, RI 02903  
[cwhitney@PierceAtwood.com](mailto:cwhitney@PierceAtwood.com)  
[kkohm@PierceAtwood.com](mailto:kkohm@PierceAtwood.com)  
[srivard@PierceAtwood.com](mailto:srivard@PierceAtwood.com)

**PRIME AE Group, Inc.**

John A. Donovan, III, Esq.  
Samuel Edward Cote, Esq.  
SLOANE AND WALSH, LLP  
One Boston Place  
201 Washington Street, Suite 1600  
Boston, MA 02108  
[jdonovan@sloanewalsh.com](mailto:jdonovan@sloanewalsh.com)  
[scote@sloanewalsh.com](mailto:scote@sloanewalsh.com)

**Stere Engineering, Inc.**

Warren D. Hutchison, Esq.  
Freeman Mathis & Gary, LLP  
60 State Street, Suite 600  
Boston, MA 02109  
[whutchison@fmglaw.com](mailto:whutchison@fmglaw.com)

**TranSystems Corporation**

Mark P. Dolan, Esq.  
RICE DOLAN & KERSHAW  
72 Pine Street, Suite 300  
Providence, RI 02903  
[mdolan@ricedolan.com](mailto:mdolan@ricedolan.com)