

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-2024-0526
Business Calendar

**PLAINTIFF STATE OF RHODE ISLAND'S ANSWERS TO DEFENDANT VANASSE
HAGEN BRUSTLIN, INC'S INTERROGATORIES DATED NOVEMBER 12, 2024**

Pursuant to Rules 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 Vanasse Hangen Brustlin, Inc.'s Interrogatories dated November 12, 2024.

**PLAINTIFF'S RESPONSES TO DEFENDANT VANASSE HANGEN BRUSTLIN, INC'S
INTERROGATORIES DATED NOVEMBER 12, 2024**

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.

RESPONSE:

- **John Preiss – #11**
- **Loren Doyle – #14**

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.

RESPONSE:

The Plaintiff objects to this interrogatory as prematurely seeking the Plaintiffs' experts' opinions. The Plaintiff will supplement this response as required by the Superior Court Rules of Civil Procedure and the Court's trial order.

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

RESPONSE:

It is undetermined at this time who the Plaintiff may call as a witness at trial. The Plaintiff will supplement this response as required by the Superior Court Rules of Civil Procedure and the Court's trial order.

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

RESPONSE:

It is undetermined at this time what documents the Plaintiff may introduce as exhibits at the trial of this matter. Subject to said objections and without waiving same, see BATES RIDOT_000000001-RIDOT_000022353 produced contemporaneously with this response. Discovery is ongoing, and the Plaintiff reserves the right to supplement this answer accordingly.

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.

RESPONSE:

Plaintiff objects to the extent this interrogatory seeks information protected by attorney-client privilege and/or the work product doctrine. Subject to said objections and without waiving same, the Plaintiff will supplement this response as provided in the Superior Court Rules of Civil Procedure and the Court's trial order.

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.

RESPONSE:

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Peter Alviti, Jr., P.E.	Rhode Island Department of Transportation ("RIDOT")	Director
Loren Doyle	RIDOT	Director of operations
Lori, Fisette, MBA PMP	RIDOT	Director of Division of Project Management
Robert Rocchio, P.E.	RIDOT	Chief Engineer for Infrastructure
John Preiss, P.E.	RIDOT	State Bridge Engineer
Keith Gaulin, P.E.	RIDOT	Deputy Chief Engineer
Mary Victoria Bertrand, P.E.	RIDOT	Managing Engineer
Anthony Pompei, P.E. PMP	RIDOT	Assistant Director for Administrative Services (Project Management)
David Cluley, P.E.	RIDOT	Managing Engineer. Worked on scope of work for 2014 AECOM project
Christopher Hart, P.E.	RIDOT	Managing Engineer. Day-to-day communications with consultants,

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
		scheduling, etc. After closure sent MBI to reinspect bridge
Gentry Andrews	RIDOT	Construction Manager
David Raposa	RIDOT	Resident Engineer
Craig Nazareth	RIDOT	Database Information Engineer
Steven Soderlund, P.E. PMO	RIDOT	Assistant Manager, Project Management
Anthony Mako	RIDOT	Project Manager I
Lawrence Bailey, P.E.	RIDOT	Managing Engineer
Ryan Salvas	RIDOT	Project Manager 1 on Washington Bridge
Anthoney Cimaglia, III	RIDOT	Construction Management
James Orr, P.E.	RIDOT (retired)	Managing Engineer
Dawn Cruz	RIDOT	Chief Financial Officer III
Kazem Farhoumand, P.E.	RIDOT (retired)	Chief Engineer
Matthew Quinan	RIDOT	Supervising Bridge Safety Inspector
George Ley, P.E.	RIDOT (retired)	Manager of Project Management
Kristen Capaldi	RIDOT (former employee)	Project manager 1 on Washington Bridge
Greg Polumbo	RIDOT (retired)	Project Manager 1 on Washington Bridge
Michael Swift	RIDOT (retired)	Resident engineer
Amanda Smith	RIDOT	Chief Document Management Specialist
Arthur Slader	RIDOT	Data Analyst I, Project Management, Materials-Section
Barry Simpson	RIDOT	Chief Program Development (ADA)
Brad Owens	RIDOT	
Brian Ferguson	RIDOT	Deputy Chief Engineer
Brian Smith	RIDOT	Administrator Financial Management
Charles St. Martin	RIDOT	Chief of Info Public Relations

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Daniel Coffland	RIDOT	Project Management-Construction
Dave Fish	RIDOT (retired)	Former Administrator of Project Management
David Capalbo	RIDOT	Assistant Director For Administrative Services (Project Management)
Elena Sabella	RIDOT	Chief Implementation Aide
Elizabeth Cornell	RIDOT	Database Management System Specialist
Everett Sammartino	RIDOT	Contracts and Specs Administrator
Gary Garzone	RIDOT	Contracts and Specs Administrator
Georgette Chahine	RIDOT (retired)	Managing Engineer
Jacob Begin	RIDOT	Interdepartmental Project Manager
James Capaldi	RIDOT	Supervising Contracts Specialist
James Gallant	RIDOT	Chief Civil Engineer (Construction & Maintenance)
James Isabella	RIDOT	Financial Management
James Pratt	RIDOT	Programming Services Officer
Jeanette Smith	RIDOT	Chief Implementation Aide
Jeffrey Ley	RIDOT	Chief Civil Engineer (Bridge Design)
Jeremy Abraham	RIDOT	Supervising Bridge Safety Inspector
Jessica DeGiovanni	RIDOT	Engineering Technician II
Jessica Rodas	RIDOT	Assistant Director for Administrative Services (Project Management)
Jim Primeau	RIDOT	Managing Engineer
Joseph Baker	RIDOT	Manager, Project Management
John Megrdochian	RIDOT	Assistant Director Financial & Contract Management
Jonathan Murray	RIDOT	Web Development

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
		Manager
Jose Lima	RIDOT	Manager, Materials and Quality Assurance
Joseph Lenk	RIDOT	Engineering Technician II (Construction Records)
Joshua Harrison	RIDOT	Principal Civil Engineer (Construction & Maintenance)
John-Paul Verducci	RIDOT	Associate Director, Division of Management Services
Justin McCoy	RIDOT	Principal Civil Engineer
Kate Wilson	RIDOT	Principal Civil Engineer (Materials)
Keary Lebeau	RIDOT	Chief Civil Engineer (Bridge Design)
Ken Buteau	RIDOT (deceased)	
Kim McDougal	RIDOT	Contracts and Specs Assistant Administrator
Kimberly Beck	RIDOT	Chief Implementation Aide
Kristen Montecalvo	RIDOT	Programming Services Officer
Lisa Shevlin	RIDOT	Chief Implementation Aid
Lisbeth V. Pettengill	RIDOT	Communications Director
Louis Maccarone	RIDOT	Project Manager II (DOT)
Martin Bradburn	RIDOT	Bridge Safety Insp. + Rate DB Inf. Manager
Mary Sietins	RIDOT	Programming Services Officer
Megan E. Hall	RIDOT	Managing Engineer
Michael Byrne	RIDOT	Managing Engineer
Michael Caroppoli	RIDOT	Chief of Highway Maintenance Field Operations
Michael Sock	RIDOT	Principal Civil Engineer (Materials)
Nicole Leporacci	RIDOT	Senior Environmental Scientist
Paul Rizzo	RIDOT	Assistant Construction Engineer

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Paul Schofield	RIDOT	Project Manager II
Peter Desimone	RIDOT	Assistant Director for Administrative Services (Project Management)
Robert Battista	RIDOT (retired)	Construction Management Resident
Robert Soscia	RIDOT	Manager, Materials and Quality Assurance
Sam Guglielmi	RIDOT	Senior Information And Public Relations Specialist
Samuel Hawkes	RIDOT	Managing Engineering
Sean Raymond	RIDOT	Assistant Director for Administrative Services (traffic)
Solight Sou	RIDOT	Chief Program Development (OCR)
Stephen Ricci, Sr.	RIDOT (former employee)	Area Engineer
Tracy Lane	RIDOT	Assistant Director Financial and Contract Management
Vince Rose	RIDOT	Supervising Bridge Safety Inspector
Vincent Palumbo	RIDOT	Manager, NEPA Cultural Resources, Utilities & Survey(
Denise Robinson	RIDOT	Engineering Technician IV (Construction Records)
Heidi Gudmunson	RIDOT	PROGRAMMING SERVICES OFFICER (Communications)
Director Marc Pappas	Rhode Island Emergency Management Agency (RIEMA)	
Colonel Darnell Weaver	Rhode Island State Police (RISP)	
Chief Sid Wordell	Rhode Island Police Chiefs Association	
All persons with	AECOM	

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
knowledge regarding AECOM's involvement with the Washington Bridge Project(s)		
Corey Richard	AECOM	Project Manager
Robert Wright	AECOM	Professional Engineer
Jeffrey Sam	AECOM	Team Leader/ Inspector
Matt Sprague	AECOM	Team Member
Richard Prior	AECOM	QA/QC Lead
Dennis Flynn	AECOM	Assisted with Traffic
Jeff Maxtutis	AECOM	Assisted with Traffic
Mark Gardella	AECOM	Environmental
Al Pratt	AECOM	Environmental
Caleigh Duffy	AECOM	Staff Inspector
Minh Pham	AECOM	Staff Inspector
Mike Allsop	AECOM	Staff Inspector
All persons with knowledge regarding Michael Baker International Inc.'s involvement with the Washington Bridge Project(s)		
Marc D'Amore	Michael Baker International, Inc.	
Paul McGuinness	Michael Baker International, Inc.	
Benjamin Tavares	Michael Baker International, Inc.	Inspector
Kirsten Bequette	Michael Baker International, Inc.	
Juan Carlos Rodriguez	Michael Baker International, Inc.	Staff Inspector
E. Raymond Whitbread	Michael Baker International, Inc.	On Call Inspection Services
All persons with knowledge regarding Vanasse Hangen Brustlin, Inc.'s		

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
involvement with the Washington Bridge Project(s)		
Jeffrey Klein	Vanasse Hangen Brustlin, Inc.	
Thomas Jackmin	Vanasse Hangen Brustlin, Inc.	
Andrew Prizzioso	Vanasse Hangen Brustlin, Inc.s	Engineer
Michael Murdock	VN Engineers, Inc-Subcontractor	Engineer
All persons with knowledge regarding Barletta Heavy Division Inc.'s involvement with the Washington Bridge Project(s)		
Kyle Ferreira	Barletta Heavy Division	
Vincent F. Barletta	Barletta Heavy Division	
All persons with knowledge regarding Barletta/Aetna I-195 Washington Bridge North Phase 2V's involvement with the Washington Bridge Project(s)		
Kyle Ferreira	Barletta Heavy Division	
Jeff Bostock	Aetna Bridge Company	
Michael Foley	Barletta/Aetna I-195 Washington Bridge North Phase 2V	Executed Contract 2021-DB-020 on behalf of JV
Vincent F. Barletta	Barletta Heavy Division	Executed JV Agreement
Hugo R. Mainelli, III	Aetna Bridge	Executed JV Agreement

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
	Company	
All persons with knowledge regarding Aetna Bridge Company's involvement with the Washington Bridge Project(s)		
Jeff Bostock	Aetna Bridge Company	
Hugo R. Mainelli, III	Aetna Bridge Company	
All persons with knowledge regarding Aries Support Services, Inc.'s involvement with the Washington Bridge Project(s)		
Pamela Olsen	Aries Support Services, Inc.	President of Aries
All persons with knowledge regarding Collins Engineers, Inc.'s involvement with the Washington Bridge Project(s)		
Robert Snelgrove	Collins Engineers, Inc.	Inspector
Seth Lemoine	Collins Engineers, Inc.	Inspector
James Karalekas Jr.	Collins Engineers, Inc.	Inspector
Matthew Liguore	Collins Engineers, Inc.	Inspector
Curtis Cheney	Collins Engineers, Inc.	Inspector
Juan Quintero	Collins Engineers, Inc.	Inspector
Daniel Cecchi	Collins Engineers, Inc.	Executed the RFP Proposal for on call

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
		Bridge Inspections on behalf of Collins Engineering in 2013.
All persons with knowledge regarding Commonwealth Engineers & Consultants, Inc.'s involvement with the Washington Bridge Project(s)		
Benjamin Soares	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
Matthew Brooks	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
Niverio Carvalho	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
Fernando Faria	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
Celita Vargas	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
James Onysko	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
All persons with knowledge regarding Jacobs Engineering Group, Inc.'s involvement with the Washington Bridge Project(s)		
Anthony Richardson	Jacobs Engineering Group, Inc.	Executed and stamped September 20, 2021 cover letter with inspection reports on behalf of Jacobs Engineering.

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Chris Henquinet	Jacobs Engineering Group, Inc.	Inspector
Vanessa Buonomano	Jacobs Engineering Group, Inc.	Inspector
Brendan Herridge	Jacobs Engineering Group, Inc.	Inspector
Cassandra Kelly	Jacobs Engineering Group, Inc.	Staff Inspector
Tianqi Qu	Jacobs Engineering Group, Inc.	Inspector
All persons with knowledge regarding Prime AE Group, Inc.'s involvement with the Washington Bridge Project(s)		
Hugh Neenan	Prime AE Group	Executed and submitted subcontractor proposal letter to AECOM for the 2014 Rehabilitation Project and signed the Construction Plan on behalf of Prime AE group as registered Professional Engineer on September 23, 2016.
Navit Nakrani	Prime AE Group	Rehab/Analysis
All persons with knowledge regarding Steere Engineering, Inc.'s involvement with the Washington Bridge Project(s)		
Jonathan Azevedo	Steere Engineering, Inc.	Professional Engineer
Patricia Steere	Steere	Executed and submitted

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
	Engineering, Inc.	subcontractor proposal letter to AECOM for the 2014 Rehabilitation Project.
All persons with knowledge regarding TranSystems Corporation's involvement with the Washington Bridge Project(s)		
Kevin Isu	TranSystems	Inspector
John Corbo	TranSystems	Team Member
Paul Nagle	TranSystems	Inspector
Victoria Sampson	TranSystems	
Corey St. Sauveur	TranSystems	
Erica Mansur	TranSystems	
Sky Lucero-Keniston	TranSystems	Staff Inspector

Discovery is ongoing and Plaintiffs reserve the right to supplement this answer accordingly.

7. Describe in full and complete detail your current damages claim arising out of the allegations set forth in the Complaint, including the total alleged damages amount.

RESPONSE:

The Plaintiff objects to this interrogatory as prematurely seeking the Plaintiffs' experts' opinion(s) and because discovery is ongoing and investigation continues. Subject to said objections and without waiving same, Plaintiff will supplement this response as required by the Superior Court Rules of Civil Procedure and the Court's trial order.

8. 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.

RESPONSE:

Plaintiff objects to the extent this interrogatory seeks information protected by attorney-client privilege, deliberative process privilege, and/or the work product doctrine. Subject to said objections and without waiving same, the Plaintiff will supplement this response as required by the Superior Court Rules of Civil Procedure and the Court's trial order.

- 9. Describe in full and complete detail each and everything you contend VHB did or did not do that you allege resulted in damages to you.

RESPONSE:

Plaintiff objects to the extent this interrogatory seeks information protected by attorney-client privilege, deliberative process privilege, and/or the work product doctrine. Subject to said objections and without waiving same, Plaintiff directs VHB to the Complaint for details related to the affirmative acts Plaintiff alleges were taken by VHB, including but not limited to: negligently failing to (a) conduct a reasonably adequate detailed research and review of the bridge structure file for the Washington Bridge, including but not limited to, previous inspection reports, drawings, and plans; (b) conduct an inspection of the Washington Bridge in conformance with the standard of care customary in the professional engineering, consulting, construction, and design industry; (c) recognize the importance and significance of the tie-down rods as critical to the stability of the Washington Bridge; (d) perform an investigation into or evaluation of the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams; and (e) recommend repairs to address the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams.

Plaintiff anticipates that documents and evidence supportive of its allegations are in the Defendants' possession, including, but not limited to, documents maintained by and electronic communications of employees and agents of all named Defendants. Discovery is ongoing, and Plaintiff reserves the right to

supplement this response accordingly.

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

RESPONSE:

Plaintiff objects to the extent this interrogatory seeks information protected by the work product doctrine. Without waiving same, see BATES RIDOT_000000001-RIDOT_000022353, produced contemporaneously with this response. Discovery is ongoing, and the Plaintiff reserves the right to supplement this answer accordingly.

11. Describe in full and complete detail your inspection protocol for the Bridge relative to its post-tensioned cantilever beams from the time the Bridge was first opened to traffic to the present, including but not limited to by identifying any and all contracts which set forth the scopes of services of others relative to inspection of the post-tensioned cantilever beams.

RESPONSE:

Plaintiff objects to the extent this interrogatory seeks information protected by the work product doctrine. Subject to said objection and without waiving the same, the current protocol for post-tensioned bridge elements is as follows:

- 1. Initial bridge inspection (first inspection for new bridge) to include Non-Destructive Testing (NDT) for post-tensioned elements to ensure proper installation. Found Defects shall be repaired.**
- 2. Perform NDT within 15 to 20 years of service to detect defects that could impact performance. Found defects shall be evaluated and repaired if necessary.**
- 3. Tension cracking found that impacts performance on Pre and Post tensioned bridge elements require NDT. Found defects shall be evaluated and repaired if necessary.**

For the inspection protocol and contracts relating to the inspection of the Bridge, we have no record of inspections specific to the post-tensioned cantilever beams until 1992. From 1992 forward:

1. In 1992, A.G. Lichtenstein & Associates, Inc. was retained to conduct an Emergency Inspection of the Bridge, which included inspecting, testing, and evaluating the post-tensioning system.
2. In 1992, a design services contract for the Rehabilitation of Washington Bridge North No. 700 was issued.
3. In 1996, RI Contract No. 9603 was issued for the Rehabilitation of the Bridge. Repairs to the post-tensioning system were included, among other items of work. Based on investigation to date, RIDOT has no record or documentation of the completed repair work to the post-tensioning system.
4. In 2013, RIDOT published the 2013 edition of its Bridge Inspection Manual.
5. In December of 2013, Request for Proposal #7540369 was issued for On-Call Statewide Bridge Inspection Services – MPA #359.
6. On March 21, 2013, Bid #7461338 for Complete Design Services for the Rehabilitation of Washington Bridge North No. 700, Mainline, Approach and Ramp Bridges, Providence and East Providence, Rhode Island was issued. That Request for Proposals was supplemented by Addendum #7461338A1 dated April 11, 2013, and by Addendum #7461338A2 dated April 22, 2013. The work in the Request for Proposals included repair details for the deteriorated structural members of the Bridge as well as the post-tensioned cantilever beams.
7. On January 29, 2014, Plaintiff entered into RI Contract No. 2014-EB-003 for Complete Design Services for the Rehabilitation of Washington Bridge North No. 700, Mainline, Approach and Ramp Bridges, Providence and East Providence, Rhode Island.
8. On or about June 18, 2014, Plaintiff entered into Notices of Contract Purchase Agreements with AECOM Technical Services, Inc., Collins Engineers, Inc., Michael Baker Jr., Inc., and TranSystems Corporation for On-Call Statewide Bridge Inspection Services – MPA #359.
9. In July of 2016, RIDOT published Addendum 1 to its Bridge Inspection Manual.
10. In December of 2016, a Request for Proposals for RI Contract No. 2016-CB-059 was issued for the Rehabilitation of Washington Bridge North 700. Based on the plans prepared and stamped by AECOM Technical Services, Inc., Prime AE Group, Inc., and Steere Engineering, Inc., no repair work to the post-tensioned cantilever beams was included.
11. In August of 2019, Request for Proposal #7598914 was issued for On-Call Statewide Bridge Inspection and Load Rating Services – MPA #359.
12. In December of 2019, Plaintiff entered into a Notice of Change/Contract Addendum for RI Contract No. 2014-EB-003.
13. On or about April 1, 2020, Plaintiff entered into Notices of Contract Purchase Agreements with AECOM Technical Services, Inc., Jacobs

Engineering Group, Inc., and TranSystems Corporation for On-Call Statewide Bridge Inspection and Load Rating Services – MPA #359.

- 14. On or about March 17, 2021, Bid #7611889 for Best Value Design-Build Procurement for Bridge Group 57T-10: I-195 Washington North Phase 2 was issued, and on or about September 1, 2021, Plaintiff entered into RI Contract No. 2021-DB-020 for Design Build Services for Bridge Group 57T-10: I-195 Washington Bridge North Phase 2. Based on the inspections and advice of the Defendants, no repair work to the post-tensioned cantilever beams was included.**

Pursuant to Rule 33(d) of the Superior Court Rules of Civil Procedure, please also see BATES RIDOT_000000001-RIDOT_000022353, produced contemporaneously with this response. Discovery is ongoing, and Plaintiff reserves the right to supplement this response accordingly.

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

RESPONSE:

Plaintiff objects to the extent this interrogatory seeks information protected by the work product doctrine or the deliberative process privilege. Subject to said objections and without waiving same, based on information that has been assembled and provided to date, there was not a choice between rehabilitating the Bridge in 2013, as opposed to demolishing and rebuilding it. Based on the results of an inspection conducted by Michael Baker International, Inc. (“MBI”) in 2011, as well as MBI’s 2012 Bridge Load Rating report, RIDOT concluded that the Bridge was in need of rehabilitation. At that time, the Bridge was well within its expected, seventy-five-year lifespan and no one—from prior inspectors, consultants, or engineers—had recommended that the Bridge needed a full replacement because it was suffering from unfixable issues with its post-tensioning system, beyond its service life, presented an imminent threat to public safety, or otherwise was unsafe. Based on the information, reports, and advice provided at the time, RIDOT embarked on an effort to rehabilitate the Bridge and on or about March 21, 2013, issued a Request for Proposals for Bid #7461338, Complete Design Services for the Rehabilitation of the Washington Bridge North No. 700 – Mainline, Approach and Ramp Bridges Providence and East Providence, Rhode Island.

13. For each item of damage you contend you have suffered as a result of the conduct of VHB, identify the item and dollar amount of damage attributed to VHB followed by the conduct giving rise to such damage, the methodology used to calculate such item of damage and the basis for your contention that VHB caused such damage.

RESPONSE:

The Plaintiff objects to this interrogatory as prematurely seeking the Plaintiffs' experts' opinions and because discovery is ongoing and investigation continues. Subject to said objections and without waiving same, Plaintiff will supplement this response as required by the Superior Court Rules of Civil Procedure and the Court's trial order.

14. Describe in full and complete detail any and all Federal monies, funding and/or grants that Plaintiff has received and/or expects to receive relative to the demolition and reconstruction of the Bridge, including but not limited to the entity providing the monies, funding and/or grant, the amount of the monies, funding and/or grant and the date the monies, funding and/or grant was received.

The State has received or expects to receive the following Federal monies, funding, and/or grants relative to the demolition and reconstruction of the Bridge:

Demolition:

- **Grant Anticipation Revenue Vehicles ("GARVEE") Bond Proceeds, which are then matched by the following State Funds: (1) State Fiscal Recovery Funds (SFRF); and (2) Rhode Island Capital Plan Fund (RICAP). A Funding Table for the Demolition Project is depicted below:**

Demolition Project Funding Table	
(in millions)	
GARVEE Bond Proceeds	\$78.26
SFRF Funds	\$19.27
RICAP Funds	\$0.30
Current Engineer's Estimate	\$97.83

The Reconstruction:

Based on estimates to date:

- **RIDOT was awarded two Discretionary Grants, which are intended to fund most of the 80% Federal share of the Reconstruction project. Those two grants were:**
 - **A Mega Grant (under the National Infrastructure Project Assistance Program) in the amount of \$125.4 million, which RIDOT was awarded on September 20, 2024; and**
 - **An INFRA Grant (under the Nationally Significant Multimodal Freight & Highway Projects Program) in the amount of \$95.6 million, which RIDOT was awarded on October 16, 2024.**
- **A 2019 “BUILD” Grant in the amount of \$15 million will be repurposed to fund another portion of the 80% Federal share.**
- **Federal Formula Bridge Funding in the approximate amount of \$4 million will be used to fund a portion of the 80% Federal share.**
- **GARVEE Bond proceeds will fund the remaining 80% of the Federal share that the grants do not cover.**

For its 20% match, the State will then use SFRF and RICAP funds. A Funding Table for the Reconstruction Project, based on the current engineer’s estimate, is depicted below:

Reconstruction Funding Table	
(in millions)	
2019 Build Grant	\$15.00
Mega Grant	\$125.40
INFRA grant	\$95.60
Federal Bridge Formula Funding	\$4.00
GARVEE Bond Proceeds	\$54.64
SFRF Funds	\$9.96
RICAP Funds	\$63.73
Current Engineer's Estimate	\$368.33

Discovery is ongoing, and the project for the reconstruction of the Bridge has yet to be awarded, and, as a result, the Plaintiff reserves the right to supplement this answer accordingly.

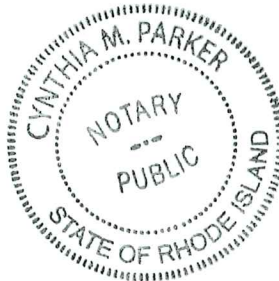
I, Loren Doyle, under the pains and penalty of perjury, declare that the foregoing is true based upon matters within my personal knowledge and information that has been assembled and provided to me and that the answers provided are correct, according to the best of my knowledge.

Loren Doyle
By: Loren Doyle

Dated: 4/1/25

STATE OF RHODE ISLAND
COUNTY OF PROVIDENCE

On this 1st day of April, 2025, 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.



Cynthia M. Parker
NOTARY PUBLIC
My commission expires: 12/20/26
Notary identification number: 752501

As to Objections,
Respectfully Submitted,
Plaintiff,
State of Rhode Island,
By its Attorneys,

/s/ Stephen N. Provazza

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND
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/s/ Theodore J. Leopold

Theodore J. Leopold (admitted *pro hac vice*)
Leslie M. Kroeger (admitted *pro hac vice*)
Diana L. Martin (admitted *pro hac vice*)
Poorad Razavi (admitted *pro hac vice*)
Takisha Richardson (admitted *pro hac vice*)
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/s/ Jonathan N. Savage

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