

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

STATE OF RHODE ISLAND,

Plaintiff,

v.

C.A. No. PC-2024-04526

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.

**DEFENDANT VANASSE HANGEN BRUSTLIN, INC.’S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

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, requests that Plaintiff, State of Rhode Island (“Plaintiff”), 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. Plaintiff 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”, or “you” or “your” shall mean the Plaintiff, State of Rhode Island and/or its agents and all other persons acting on its behalf.

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

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

11. The term “Amended 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

32. All documents concerning the allegations in paragraph 102 of the Complaint that the increased traffic volume has resulted in physical wear and tear damage to the East Bound Washington Bridge.
33. All documents concerning the allegations in paragraph 103 of the Complaint that there has been wear and tear to the East Bound Washington Bridge that would not have otherwise occurred.
34. All documents concerning the allegations in paragraph 104 of the Complaint that repairs to physical aspects of the East Bound Washington Bridge are required on a much more frequent basis than they would have otherwise been required.
35. All documents relating to the allegations in paragraph 105 of the Complaint that physical maintenance is required on a more frequent basis to keep the East Bound Washington Bridge in safe operating condition.
36. All documents concerning the allegations in paragraph 106 of the Complaint related to advanced monitoring systems including real time sensors and structural health monitoring equipment.
37. All documents concerning specifically any damages you allege as a result of the allegations regarding alleged additional physical wear and tear damage to the eastbound bridge as generally alleged in paragraphs 96 through 106 of the complaint. This request is specifically seeking documents and information relating to damages to the eastbound bridge and not related to any damages relating specifically to the westbound bridge.
38. All documents concerning the allegations contained in paragraph 186 of the complaint that VHB specifically and negligently failed to do or not to any of the items or activities contained in (a) through (g).

Respectfully submitted,

VANASSE HANGEN BRUSTLIN, INC.

By and through Counsel:

/s/ Brian C. Newberry, Esq.

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Date: June 2, 2025

CERTIFICATE OF SERVICE

I hereby certify that this document, was served through the Odyssey File & Serve System, and 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 2nd day of June, 2025. The document is further available for viewing and/or downloading from the System.

/s/ Brian C. Newberry, Esq.
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