

STATE OF RHODE ISLAND
PROVIDENCE COUNTY

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.,
TRANSYSSTMS CORPORATION, and
VANASSE HANGEN BRUSTLION, INC.

Defendants.

**DEFENDANT BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2
JV, FIRST SET OF INTERROGATORIES TO PLAINTIFF**

Defendant, Barletta/Aetna I-195 Washington Bridge North Phase 2 JV (“JV”), by and through the undersigned counsel and pursuant to Rule 33 of the Rhode Island Rules of Civil Procedure, hereby serves its First Set of Interrogatories to Plaintiff, the State of Rhode Island (“State”), and requests that the State answer each question within forty (40) days of service.

INSTRUCTIONS

1. The State shall answer each question separately and fully in writing and under oath.
2. Answers to these interrogatories must include information known to the State. If the person or persons answering these interrogatories does not have enough information to answer any of the interrogatories, it is his or her duty to make a reasonable effort to obtain such information.
3. These interrogatories are ongoing in nature, requiring you to promptly update or supplement your responses upon discovering any new information that necessitates such amendments or supplements.
4. When an objection is made to any interrogatory or subpart thereof, it shall state with specificity all grounds upon which the objecting party relies. 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.

DEFINITIONS

1. The term “**AMENDED COMPLAINT**” refers to the amended 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, on April 14, 2025.
2. The terms “**PLAINTIFF**,” “**STATE**,” “**RIDOT**,” “**YOU**,” or “**YOUR**” shall mean the Plaintiff, State of Rhode Island, acting through the Rhode Island Department of Transportation, and/or its agents and all other persons acting on its behalf.

3. The terms “**DEFENDANT**” or “**JV**” mean Barletta/Aetna I-195 Washington Bridge North Phase 2 JV, together with their affiliates, agents, trustees, employees, representatives, predecessors, or anyone else acting on their behalf.

4. The term “**PERSON**” means any natural person, entity or organization, including any divisions, departments, subsidiaries, or other units thereof.

5. The term “**2021 RFP**” shall mean the Requests for Proposals/Bid No. 7611889, entitled “Best Value Design-Build Procurement for Bridge Group 57T-10: I-195 Washington North Phase 2.”

6. The term “**DESIGN-BUILD PROPOSERS**” shall refer to proposers who submitted technical and price proposals in response to the 2021 RFP.

7. The term “**PROJECT**” shall mean the design and construction project known as the I-195 Washington North Phase 2 Project in connection with the 2021 RFP.

8. The term “**2021 DESIGN-BUILD CONTRACT**” shall mean the contract, 2021-DB-020, entered into between the JV and RIDOT regarding the PROJECT.

9. The term “**LICHTENSTEIN REPORT**” shall mean the January 27, 1992 Lichtenstein & Associates inspection report, as referenced in AMENDED COMPLAINT ¶¶ 33-39.

10. The terms “**RELATE TO,**” “**REFER TO,**” or “**REGARDING,**” as well as all tenses and forms thereof, shall be used in their broadest sense and mean constituting, respecting, relating, regarding, concerning, referring or pertaining to, stating, establishing, showing, reflecting, describing, recording, noting, embodying, mentioning, constituting, evidencing, containing, analyzing, discussing, supporting, verifying, rebutting, refuting, negating, contradicting, comprising, memorializing, identifying, and/or in any way involving or having a logical connection to the subject matter of the request, in whole or in part.

11. The term “**WASHINGTON BRIDGE**” refers to I-195 westbound Washington Bridge in Rhode Island, formally known as the Washington Bridge North No. 700, which was constructed in 1967 and opened to traffic in 1968.

12. The term “**POST-CLOSURE**” refers to all events occurring after the closure of the WASHINGTON BRIDGE on December 11, 2023, RELATED TO the WASHINGTON BRIDGE.

13. The term “**WASHINGTON BRIDGE NO. 200**” refers to eastbound Washington Bridge, formally known as Rhode Island Bridge No. 200, which was constructed between 1928 and 1930 and was used to connect Providence to East Providence for both eastbound and westbound traffic.

14. Capitalized terms not otherwise defined herein shall take on their meaning set forth in the 2021-DESIGN-BUILD CONTRACT, Part 3, Appendix C: Abbreviations, Definitions, and Terms.

15. The words “and” and “or” should be read inclusively, as “and/or.”

16. The words “any” and “all” should be read inclusively, as “any/all.”

17. References to the singular shall include the plural and references to the plural shall include the singular.

18. The use of a verb in any tense shall be construed as the use of the verb in that and all other tenses.

INTERROGATORIES

1. Identify the total cost of RIDOT’s POST-CLOSURE investigation of the WASHINGTON BRIDGE, which resulted in RIDOT’s decision to demolish and rebuild the WASHINGTON BRIDGE. Please itemize the costs by category or PERSON, including a description of the services provided and the respective cost amounts.

2. Identify RIDOT’s budget(s) for inspection of the WASHINGTON BRIDGE between January 1, 2000 to December 11, 2023.

3. Identify the individuals who set the inspection budget(s) for the WASHINGTON BRIDGE between January 1, 2000 to December 11, 2023.

4. Identify each PERSON engaged by RIDOT to conduct inspections of the WASHINGTON BRIDGE between January 1, 2000 through the present date. Please itemize, by

year and the PERSON(S) engaged by RIDOT, including their roles and the services they provided.

5. Explain what analysis RIDOT performed to determine the scope of work required for each inspection of the WASHINGTON BRIDGE.

6. Identify all dates radiographic, ultrasonic shear wave tomography (“MIRA”), or ground penetrating radar (“GPR”) testing was performed on the WASHINGTON BRIDGE, and on what components the testing was performed.

7. In reference to AMENDED COMPLAINT, ¶ 91, identify whether the BTC addressed the existence of problems relating to the tie-down rods at Piers 6 and 7 and called for repairs to the post-tensioning systems of the WASHINGTON BRIDGE. If so, please identify the specific BTC plan sheet number(s) and describe in detail the work the BTC required the JV to perform on the tie-down rods at Piers 6 and 7 and the WASHINGTON BRIDGE’S post-tensioning systems.

Dated: June 13, 2025

Respectfully submitted,

FOLEY & LARDNER LLP

/s/ Jeffrey R. Blease

Jeffrey R. Blease (MB #675247)
111 Huntington Avenue, Suite 2500
Boston, MA 02199
jblease@foley.com
Admitted Pro Hac Vice

Christopher D. Mellado (FB #1018915)
301 E. Pine Street, Suite 1200
Orlando, FL 32801
chris.mellado@foley.com
Admitted Pro Hac Vice

*Lead Counsel for Barletta/Aetna I-195
Washington Bridge North Phase 2 JV and
Barletta*

LYNCH & PINE

/s/ Jeffrey B. Pine

Jeffrey B. Pine #2278
1 Park Row, 5th Floor
Providence, Rhode Island 02903
jpine@lynchpine.com

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

**KELLY, SOUZA, PARMENTER &
RESNICK, P.C.**

/s/ Jackson C. Parmenter
Jackson C. Parmenter #8396
128 Dorrance Street, Suite 300
Providence, Rhode Island 02903
jparmenter@ksprlaw.com

*Attorney for Barletta/Aetna I-195 Washington
Bridge North Phase 2 JV and Lead Counsel
for Aetna*

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 13th of June, 2025. The document is further available for viewing and/or downloading from the System.

/s/ Jeffrey B. Pine
Jeffrey B. Pine #2278