

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

*Defendants.*

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

Defendant, Barletta/Aetna I-195 Washington Bridge North Phase 2 JV (“JV”), by and through the undersigned counsel and pursuant to Rule 34 of the Rhode Island Rules of Civil Procedure, hereby serves its First Set of Requests for Production on Plaintiff, the State of Rhode Island (“State”), and requests that the State produce and/or permit inspection of each item requested below within forty (40) days of service at the office of Lynch & Pine, 1 Park Row Fifth Floor, Providence, Rhode Island 02903.

## **INSTRUCTIONS**

1. When responding to this document request, you are asked to furnish all information in your possession, custody or control, or in that of your attorneys, employees, agents, or any other person acting on your behalf or on whose behalf you are acting. A document is deemed to be in your possession, custody or control if you have physical custody of the document, if you have a right, by agreement or otherwise, to inspect and examine the document or if, as a practical matter, you have been granted access to the document.

2. If you withhold any document because you object to the request for the document on grounds of privilege, work product, confidentiality, or privacy, specify with particularity: (1) the reason(s) for withholding; (2) the portion of this demand (*i.e.*, request number or numbers) to which each withheld document is responsive; (3) the parties to the document (*e.g.*, addressers, addressees and intended recipients of copies); (4) the date of the document; (5) the subject matter of the document; (6) the length in pages of the document; (7) the location of the document; and (8) the custodian of the document.

3. If any document responding to all or any part of any document request is not currently available, include a statement to that effect and furnish whatever documents are available. Include in your statement when such documents were most recently in your possession or subject to your control and what disposition was made of them, and identify by name, job title and the last known business address, each PERSON currently in possession or control of such documents. If any such documents have been destroyed, identify by name, job title and the last known business address, each PERSON who directed that the documents be destroyed, the PERSON(S) actually destroying the documents, and state the reasons the documents were destroyed. Also, if a log or list of such destroyed documents was prepared, produce that log or list.

4. If you are unable to produce any documents in response to a request after exercising due diligence to do so, please so state and then answer the Request as completely as possible, explaining why you are unable to secure the documents sought by the Request.

5. All responsive DOCUMENTS or COMMUNICATIONS, whether stored or maintained in hardcopy or as electronically stored information (“ESI”) shall be produced electronically pursuant to the Stipulation Regarding Discovery of Electronically Stored Information.

6. These requests for production shall be deemed continuing in nature so as to require you to promptly amend or supplement any responses upon discovery of any additional documents which are responsive, or in the event that a response, though correct when made, is later discovered to have been incorrect in fact.

### 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 terms “**DOCUMENT**” or “**DOCUMENTS**” means all materials within the full scope of Rhode Island Rules of Evidence, including but not limited to: all writings and recordings, including the originals and no identical copies, whether different from the original by reason of any notation made on such copies or otherwise (including but without limitation to, email and attachments, correspondence, memoranda, notes, diaries, minutes, statistics, letters, telegrams, contracts, reports, studies, checks, statements, tags, labels, invoices, brochures, periodicals, receipts, returns, summaries, pamphlets, books, interoffice and intraoffice communications, offers,

notations of any sort of conversations, working papers, applications, permits, file wrappers, indices, telephone calls, meetings or printouts, teletypes, telefax, invoices, worksheets, and all drafts, alterations, modifications, changes and amendments of any of the foregoing), graphic or aural representations of any kind (including without limitation, photographs, charges, microfiche, microfilm, videotape, recordings, motion pictures, plans, drawings, surveys) and electronic, mechanical, magnetic, digital, optical or electric records or representations of any kind (including without limitation, computer files and programs, tapes, databases, cassettes, discs, recordings), including metadata.

6. The term “**COMMUNICATION**” means any and all recordings of any transfer of information, ideas, opinions, or thoughts, made by any means, at any time or place, under any circumstances. COMMUNICATIONS include but are not limited to direct exchanges between PERSONS, and may be embodied in any means or media.

7. 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.”

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

9. 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.

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

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

12. 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.

13. 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.

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.

### **REQUESTS FOR PRODUCTION**

1. All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT’s determination to issue the 2021 RFP for rehabilitation of the WASHINGTON BRIDGE instead of a demolition and replacement project.

2. All DOCUMENTS provided to DESIGN-BUILD PROPOSERS for the 2021 RFP.

3. All DOCUMENTS and COMMUNICATIONS RELATED TO the BTC and the post-tensioning system or Piers 6 and 7 of the WASHINGTON BRIDGE.

4. All COMMUNICATIONS between or among RIDOT and any DESIGN-BUILD PROPOSERS for the PROJECT.

5. All design-build proposals submitted in response to the 2021 RFP.
6. All DOCUMENTS RELATED TO RIDOT's score or evaluation of design-build proposals for the PROJECT.
7. All DOCUMENTS AND COMMUNICATIONS RELATED TO sources of funds available to procure the PROJECT.
8. A copy of RIDOT's risk matrix RELATED TO the 2021 DESIGN-BUILD CONTRACT.
9. A copy of the 2021 DESIGN-BUILD CONTRACT.
10. All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's review, approval, or concurrence with the JV's WASHINGTON BRIDGE rehabilitation plans, including, but not limited to, comment resolution forms, RIDOT transmittals, and certificates of compliance.
11. All meeting minutes RELATED TO the PROJECT.
12. All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR allegations in the AMENDED COMPLAINT ¶¶ 34-39.
13. All DOCUMENTS and COMMUNICATIONS RELATED TO the LICHTENSTEIN REPORT.
14. All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR allegations in the AMENDED COMPLAINT ¶ 91.
15. All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR allegations in the AMENDED COMPLAINT ¶¶ 92-95.
16. All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR allegations in the AMENDED COMPLAINT ¶¶ 103-106.

17. All organizational charts, procedures, instructions, or guidelines that RELATE TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE.

18. All COMMUNICATIONS with the Federal Highway Administration RELATING TO the WASHINGTON BRIDGE after January 1, 2021.

19. All COMMUNICATIONS with Wiss, Janney, Elstner Associates, Inc. RELATED TO the WASHINGTON BRIDGE after December 11, 2023.

20. All COMMUNICATIONS with McNary Bergeron & Johannesen, LLC RELATED TO the WASHINGTON BRIDGE after December 11, 2023.

21. All COMMUNICATIONS between or among Peter Alviti, Jr., P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

22. All COMMUNICATIONS between or among Loren Doyle and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

23. All COMMUNICATIONS between or among Lori Fisette and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

24. All COMMUNICATIONS between or among Robert Rocchio, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

25. All COMMUNICATIONS between or among John Preiss, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

26. All COMMUNICATIONS between or among Anthony Pompei, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

27. All COMMUNICATIONS between or among Dawn Cruz and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

28. All COMMUNICATIONS between or among RIDOT and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after December 11, 2023.

29. All work authorizations, contracts, or agreements entered into by RIDOT with any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE.

30. All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's determination to demolish and replace the WASHINGTON BRIDGE.

31. All inspection and maintenance DOCUMENTS RELATED TO the WASHINGTON BRIDGE, including, but not limited to, logs, repair records, inspection reports, condition assessments, safety evaluations, compliance certificates, service records, work orders, maintenance schedules, inspection checklists, daily reports, weekly reports, monthly reports, and daily time sheets.

32. All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's financial records or budgets for inspections of the WASHINGTON BRIDGE.

33. All DOCUMENTS and COMMUNICATIONS RELATED TO the inspection costs of the WASHINGTON BRIDGE incurred by RIDOT after December 11, 2023.



34. All photographs or videos of the WASHINGTON BRIDGE.

Dated: June 13, 2025

Respectfully submitted,

**FOLEY & LARDNER LLP**

/s/ Jeffrey R. Blease

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**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  
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