

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, SECOND 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 Second 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 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 words “and” and “or” should be read inclusively, as “and/or.”

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

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

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

INTERROGATORIES

8. Is YOUR response to each request for admission in the JV's First Requests for Admissions to RIDOT, dated June 13, 2025, an unqualified admission? If not, for each response that is not an unqualified admission:

- a. State the number of the request;
- b. State all facts on which you base YOUR response;
- c. State the names, addresses, and telephone numbers of all persons who have knowledge of those facts; and
- d. Identify all DOCUMENTS and other tangible things that support YOUR response and state the name, address, and telephone number of the person who has each DOCUMENT or thing.

Dated: June 20, 2025

Respectfully submitted,

FOLEY & LARDNER LLP

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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 20th of June, 2025. The document is further available for viewing and/or downloading from the System.

/s/ Jeffrey B. Pine
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