

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT AECOM TECHNICAL SERVICES, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant AECOM TECHNICAL SERVICES, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

including the right to serve additional interrogatories related to the subjects below, or on any other subject.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Rhode Island Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to the interrogatories set forth herein (hereinafter, the “Interrogatories”).

2. As used in the Interrogatories, the following terms are to be interpreted in accordance with the following definitions:

- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means AECOM TECHNICAL SERVICES, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

3. The terms used in the Interrogatories should be construed as broadly as possible to the fullest extent of their meaning in a good faith effort to comply with the Superior Court Rules of Civil Procedure. Unless words or terms have been given a specific definition herein, each word or term used shall herein be given its usual and customary dictionary definition except where such words have a usual custom or usage definition in your trade or industry, in which case they shall be interpreted in accordance with such usual custom and usage definition of which you are aware.

4. Any reference to any individual or entity herein includes all predecessors or successors in interest of said individual or entity and all principals, agents, former and current

employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

6. If any portion of an Interrogatory response is withheld on the ground of privilege or any other objection, then for each such response describe the privilege or objection being asserted and provide information sufficient to permit the Court to rule on your privilege claim in accordance with the Rhode Island Superior Court Rules of Civil Procedure. For each assertion of the privilege, state the nature of the privilege, and the privilege rule being invoked.

- (a) If the privilege applies to an oral Communication, then state (i) the name of the person making the Communication and the names of all persons present while the Communication was made, and if not apparent, the relationships of all persons present for the Communication; (ii) the date and place of the Communication; and (iii) the general subject matter of the Communication.
- (b) If the privilege applies to one or more Documents, then state separately for each such Document: (i) the type of Document (*e.g.*, letter, memorandum, email, report, recording, etc.); (ii) the Document's general subject matter; (iii) the Document's date; (iv) its author; (v) its addressees, if any; (vi) any other recipients of the Document; (vii) the relationship of the author, addressees, and recipients to each

other; (viii) the author's title or position; and (ix) the basis for the privilege objection.

7. An Interrogatory that asks you to identify documents requires you to provide at least the following: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the author(s), addressee(s) and recipient(s) of the document; and (e) the location(s) of the document.

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9. An Interrogatory that asks you to identify communications requires you to provide at least the following: (a) for communications reflected in written documents the information you are required to provide in response to an interrogatory that asks you to identify documents, or (b) for all other communications, (i) the name of the person making the communication and the names of persons present while the communication was made; (ii) the date and place of communication; and (iii) the general subject matter of the communication.

10. These Interrogatories are continuing in nature, so that if you subsequently discover or obtain additional information, then you are obligated to supplement your responses to these Interrogatories promptly and provide later discovered responsive information up to the day of trial.

INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
4. Which descriptions of deterioration in the February 26, 2024 VN Engineers Report, if any, were You and Your subconsultants aware of during Your respective involvement with the Washington Bridge?
5. Identify RIDOT's oversight provided to You during Your work on the Washington Bridge.
6. Identify how You monitored contractors' compliance with maintenance standards regarding the Washington Bridge.
7. Identify all steps taken by You in evaluating the Washington Bridge's fracture-critical elements.
8. Identify how risk assessments were conducted for the Washington Bridge's critical areas.
9. Based on industry standards, what should be the frequency and scope of inspections pertaining to the post-tensioning system for a bridge with a design such as the Washington Bridge?
10. What methods should have been employed to properly assess the condition of the post-tensioned cables and grout during Your work on the Washington Bridge?
11. Based on AECOM's 2014 inspection and design plans, what critical issues should have been addressed in the proposed rehabilitation?
12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Theodore J. Leopold

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

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**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT AETNA BRIDGE COMPANY**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant AETNA BRIDGE COMPANY, (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

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FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

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<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT ARIES SUPPORT SERVICES, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant ARIES SUPPORT SERVICES, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

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/s/ Michael P. Robinson

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**PLAINTIFF STATE OF RHODE ISLAND'S FIRST SET OF INTERROGATORIES TO
DEFENDANT BARLETTA HEAVY DIVISION, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island ("Plaintiff") requests that defendant BARLETTA HEAVY DIVISION, INC., ("Defendant") provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant's attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

including the right to serve additional interrogatories related to the subjects below, or on any other subject.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Rhode Island Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to the interrogatories set forth herein (hereinafter, the “Interrogatories”).

2. As used in the Interrogatories, the following terms are to be interpreted in accordance with the following definitions:

- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means BARLETTA HEAVY DIVISION, INC., (“and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

3. The terms used in the Interrogatories should be construed as broadly as possible to the fullest extent of their meaning in a good faith effort to comply with the Superior Court Rules of Civil Procedure. Unless words or terms have been given a specific definition herein, each word or term used shall herein be given its usual and customary dictionary definition except where such words have a usual custom or usage definition in your trade or industry, in which case they shall be interpreted in accordance with such usual custom and usage definition of which you are aware.

4. Any reference to any individual or entity herein includes all predecessors or successors in interest of said individual or entity and all principals, agents, former and current

employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

6. If any portion of an Interrogatory response is withheld on the ground of privilege or any other objection, then for each such response describe the privilege or objection being asserted and provide information sufficient to permit the Court to rule on your privilege claim in accordance with the Rhode Island Superior Court Rules of Civil Procedure. For each assertion of the privilege, state the nature of the privilege, and the privilege rule being invoked.

- (a) If the privilege applies to an oral Communication, then state (i) the name of the person making the Communication and the names of all persons present while the Communication was made, and if not apparent, the relationships of all persons present for the Communication; (ii) the date and place of the Communication; and (iii) the general subject matter of the Communication.
- (b) If the privilege applies to one or more Documents, then state separately for each such Document: (i) the type of Document (*e.g.*, letter, memorandum, email, report, recording, etc.); (ii) the Document's general subject matter; (iii) the Document's date; (iv) its author; (v) its addressees, if any; (vi) any other recipients of the Document; (vii) the relationship of the author, addressees, and recipients to each

other; (viii) the author's title or position; and (ix) the basis for the privilege objection.

7. An Interrogatory that asks you to identify documents requires you to provide at least the following: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the author(s), addressee(s) and recipient(s) of the document; and (e) the location(s) of the document.

8. An Interrogatory that asks you to identify persons requires you to provide at least the following: (a) the person's full name; (b) the person's present or last known address and telephone number; and (c) when referring to a natural person, the person's present or last known place of employment.

9. An Interrogatory that asks you to identify communications requires you to provide at least the following: (a) for communications reflected in written documents the information you are required to provide in response to an interrogatory that asks you to identify documents, or (b) for all other communications, (i) the name of the person making the communication and the names of persons present while the communication was made; (ii) the date and place of communication; and (iii) the general subject matter of the communication.

10. These Interrogatories are continuing in nature, so that if you subsequently discover or obtain additional information, then you are obligated to supplement your responses to these Interrogatories promptly and provide later discovered responsive information up to the day of trial.

INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
4. Which descriptions of deterioration in the February 26, 2024 VN Engineers Report, if any, were You and Your subconsultants aware of during Your respective Involvement with the Washington Bridge?
5. Identify RIDOT's oversight provided to You during Your work on the Washington Bridge.
6. Identify how You monitored contractors' compliance with maintenance standards regarding the Washington Bridge.
7. Identify all steps taken by You in evaluating the Washington Bridge's fracture-critical elements.
8. Identify how risk assessments were conducted for the Washington Bridge's critical areas.
9. Based on industry standards, what should be the frequency and scope of inspections pertaining to the post-tensioning system for a bridge with a design such as the Washington Bridge?
10. What methods should have been employed to properly assess the condition of the post-tensioned cables and grout during Your work on the Washington Bridge?
11. Based on AECOM's 2014 inspection and design plans, what critical issues should have been addressed in the proposed rehabilitation?
12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza
PETER F. NERONHA
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/s/ Jonathan N. Savage
Jonathan N. Savage, Esq. (#3081)
Michael P. Robinson, Esq. (#6306)
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mrobinson@savagelawpartners.com
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT COLLINS ENGINEERS, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant COLLINS ENGINEERS, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

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- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means COLLINS ENGINEERS, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

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employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

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other; (viii) the author's title or position; and (ix) the basis for the privilege objection.

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INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
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11. Based on AECOM's 2014 inspection and design plans, what critical issues should have been addressed in the proposed rehabilitation?
12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

PETER F. NERONHA
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/s/ Theodore J. Leopold

Theodore J. Leopold (admitted pro hac vice)
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/s/ Jonathan N. Savage

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js@savagelawpartners.com
mrobinson@savagelawpartners.com
epare@savagelawpartners.com

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT COMMONWEALTH ENGINEERS & CONSULTANTS, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant COMMONWEALTH ENGINEERS & CONSULTANTS, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights

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DEFINITIONS AND INSTRUCTIONS

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- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means COMMONWEALTH ENGINEERS & CONSULTANTS, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

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employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

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10. These Interrogatories are continuing in nature, so that if you subsequently discover or obtain additional information, then you are obligated to supplement your responses to these Interrogatories promptly and provide later discovered responsive information up to the day of trial.

INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
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5. Identify RIDOT's oversight provided to You during Your work on the Washington Bridge.
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FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

PETER F. NERONHA
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/s/ Theodore J. Leopold

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
v.)	C.A. No. PC-2024-04526
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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.,)	
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PRIME AE GROUP, INC.,)	
STEERE ENGINEERING, INC.,)	
TRANSYSTEMS CORPORATION, AND)	
VANASSE HANGEN BRUSTLIN, INC.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT JACOBS ENGINEERING GROUP, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant JACOBS ENGINEERING GROUP, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

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- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means JACOBS ENGINEERING GROUP, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

3. The terms used in the Interrogatories should be construed as broadly as possible to the fullest extent of their meaning in a good faith effort to comply with the Superior Court Rules of Civil Procedure. Unless words or terms have been given a specific definition herein, each word or term used shall herein be given its usual and customary dictionary definition except where such words have a usual custom or usage definition in your trade or industry, in which case they shall be interpreted in accordance with such usual custom and usage definition of which you are aware.

4. Any reference to any individual or entity herein includes all predecessors or successors in interest of said individual or entity and all principals, agents, former and current

employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

6. If any portion of an Interrogatory response is withheld on the ground of privilege or any other objection, then for each such response describe the privilege or objection being asserted and provide information sufficient to permit the Court to rule on your privilege claim in accordance with the Rhode Island Superior Court Rules of Civil Procedure. For each assertion of the privilege, state the nature of the privilege, and the privilege rule being invoked.

- (a) If the privilege applies to an oral Communication, then state (i) the name of the person making the Communication and the names of all persons present while the Communication was made, and if not apparent, the relationships of all persons present for the Communication; (ii) the date and place of the Communication; and (iii) the general subject matter of the Communication.
- (b) If the privilege applies to one or more Documents, then state separately for each such Document: (i) the type of Document (*e.g.*, letter, memorandum, email, report, recording, etc.); (ii) the Document's general subject matter; (iii) the Document's date; (iv) its author; (v) its addressees, if any; (vi) any other recipients of the Document; (vii) the relationship of the author, addressees, and recipients to each

other; (viii) the author's title or position; and (ix) the basis for the privilege objection.

7. An Interrogatory that asks you to identify documents requires you to provide at least the following: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the author(s), addressee(s) and recipient(s) of the document; and (e) the location(s) of the document.

8. An Interrogatory that asks you to identify persons requires you to provide at least the following: (a) the person's full name; (b) the person's present or last known address and telephone number; and (c) when referring to a natural person, the person's present or last known place of employment.

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10. These Interrogatories are continuing in nature, so that if you subsequently discover or obtain additional information, then you are obligated to supplement your responses to these Interrogatories promptly and provide later discovered responsive information up to the day of trial.

INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
4. Which descriptions of deterioration in the February 26, 2024 VN Engineers Report, if any, were You and Your subconsultants aware of during Your respective Involvement with the Washington Bridge?
5. Identify RIDOT's oversight provided to You during Your work on the Washington Bridge.
6. Identify how You monitored contractors' compliance with maintenance standards regarding the Washington Bridge.
7. Identify all steps taken by You in evaluating the Washington Bridge's fracture-critical elements.
8. Identify how risk assessments were conducted for the Washington Bridge's critical areas.
9. Based on industry standards, what should be the frequency and scope of inspections pertaining to the post-tensioning system for a bridge with a design such as the Washington Bridge?
10. What methods should have been employed to properly assess the condition of the post-tensioned cables and grout during Your work on the Washington Bridge?
11. Based on AECOM's 2014 inspection and design plans, what critical issues should have been addressed in the proposed rehabilitation?
12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

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ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza
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mrobinson@savagelawpartners.com
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV, (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves

all rights regarding future interrogatories, including the right to serve additional interrogatories related to the subjects below, or on any other subject.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Rhode Island Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to the interrogatories set forth herein (hereinafter, the “Interrogatories”).

2. As used in the Interrogatories, the following terms are to be interpreted in accordance with the following definitions:

- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
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5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

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10. These Interrogatories are continuing in nature, so that if you subsequently discover or obtain additional information, then you are obligated to supplement your responses to these Interrogatories promptly and provide later discovered responsive information up to the day of trial.

INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
4. Which descriptions of deterioration in the February 26, 2024 VN Engineers Report, if any, were You and Your subconsultants aware of during Your respective involvement with the Washington Bridge?
5. Identify RIDOT's oversight provided to You during Your work on the Washington Bridge.
6. Identify how You monitored contractors' compliance with maintenance standards regarding the Washington Bridge.
7. Identify all steps taken by You in evaluating the Washington Bridge's fracture-critical elements.
8. Identify how risk assessments were conducted for the Washington Bridge's critical areas.
9. Based on industry standards, what should be the frequency and scope of inspections pertaining to the post-tensioning system for a bridge with a design such as the Washington Bridge?
10. What methods should have been employed to properly assess the condition of the post-tensioned cables and grout during Your work on the Washington Bridge?
11. Based on AECOM's 2014 inspection and design plans, what critical issues should have been addressed in the proposed rehabilitation?
12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?
13. Identify all individuals involved in preparing the JV's proposal who relied on the BTC or any State representations regarding the condition of the Washington Bridge and describe in detail the nature and extent of such reliance.
14. Describe in detail any consideration given by the JV to performing or requesting

additional non-visual testing (such as radiographic, GPR, or MIRA) prior to or during the Project, including the reasons for undertaking or not undertaking such testing.

15. Identify all actions taken by the JV to mitigate damages allegedly resulting from the State's purported breaches, including any efforts to redesign, reallocate resources, or seek alternative solutions after the closure of the Washington Bridge.
16. Describe in detail the methodology used by the JV to calculate the damages claimed in its counterclaims, including all categories of damages, assumptions made, and supporting documentation.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza
PETER F. NERONHA
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STATE OF RHODE ISLAND
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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
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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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT MICHAEL BAKER INTERNATIONAL, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant MICHAEL BAKER INTERNATIONAL, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights

regarding future interrogatories, including the right to serve additional interrogatories related to the subjects below, or on any other subject.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Rhode Island Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to the interrogatories set forth herein (hereinafter, the “Interrogatories”).

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- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means MICHAEL BAKER INTERNATIONAL, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

3. The terms used in the Interrogatories should be construed as broadly as possible to the fullest extent of their meaning in a good faith effort to comply with the Superior Court Rules of Civil Procedure. Unless words or terms have been given a specific definition herein, each word or term used shall herein be given its usual and customary dictionary definition except where such words have a usual custom or usage definition in your trade or industry, in which case they shall be interpreted in accordance with such usual custom and usage definition of which you are aware.

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employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

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7. An Interrogatory that asks you to identify documents requires you to provide at least the following: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the author(s), addressee(s) and recipient(s) of the document; and (e) the location(s) of the document.

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INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
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12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

PETER F. NERONHA
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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

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v.)	C.A. No. PC-2024-04526
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AETNA BRIDGE COMPANY,)	
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STEERE ENGINEERING, INC.,)	
TRANSYSTEMS CORPORATION, AND)	
VANASSE HANGEN BRUSTLIN, INC.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT PRIME AE GROUP, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant PRIME AE GROUP, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

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- (c) “Defendant” means PRIME AE GROUP, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

3. The terms used in the Interrogatories should be construed as broadly as possible to the fullest extent of their meaning in a good faith effort to comply with the Superior Court Rules of Civil Procedure. Unless words or terms have been given a specific definition herein, each word or term used shall herein be given its usual and customary dictionary definition except where such words have a usual custom or usage definition in your trade or industry, in which case they shall be interpreted in accordance with such usual custom and usage definition of which you are aware.

4. Any reference to any individual or entity herein includes all predecessors or successors in interest of said individual or entity and all principals, agents, former and current

employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

6. If any portion of an Interrogatory response is withheld on the ground of privilege or any other objection, then for each such response describe the privilege or objection being asserted and provide information sufficient to permit the Court to rule on your privilege claim in accordance with the Rhode Island Superior Court Rules of Civil Procedure. For each assertion of the privilege, state the nature of the privilege, and the privilege rule being invoked.

- (a) If the privilege applies to an oral Communication, then state (i) the name of the person making the Communication and the names of all persons present while the Communication was made, and if not apparent, the relationships of all persons present for the Communication; (ii) the date and place of the Communication; and (iii) the general subject matter of the Communication.
- (b) If the privilege applies to one or more Documents, then state separately for each such Document: (i) the type of Document (*e.g.*, letter, memorandum, email, report, recording, etc.); (ii) the Document's general subject matter; (iii) the Document's date; (iv) its author; (v) its addressees, if any; (vi) any other recipients of the Document; (vii) the relationship of the author, addresses, and recipients to each

other; (viii) the author's title or position; and (ix) the basis for the privilege objection.

7. An Interrogatory that asks you to identify documents requires you to provide at least the following: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the author(s), addressee(s) and recipient(s) of the document; and (e) the location(s) of the document.

8. An Interrogatory that asks you to identify persons requires you to provide at least the following: (a) the person's full name; (b) the person's present or last known address and telephone number; and (c) when referring to a natural person, the person's present or last known place of employment.

9. An Interrogatory that asks you to identify communications requires you to provide at least the following: (a) for communications reflected in written documents the information you are required to provide in response to an interrogatory that asks you to identify documents, or (b) for all other communications, (i) the name of the person making the communication and the names of persons present while the communication was made; (ii) the date and place of communication; and (iii) the general subject matter of the communication.

10. These Interrogatories are continuing in nature, so that if you subsequently discover or obtain additional information, then you are obligated to supplement your responses to these Interrogatories promptly and provide later discovered responsive information up to the day of trial.

INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
4. Which descriptions of deterioration in the February 26, 2024 VN Engineers Report, if any, were You and Your subconsultants aware of during Your respective Involvement with the Washington Bridge?
5. Identify RIDOT's oversight provided to You during Your work on the Washington Bridge.
6. Identify how You monitored contractors' compliance with maintenance standards regarding the Washington Bridge.
7. Identify all steps taken by You in evaluating the Washington Bridge's fracture-critical elements.
8. Identify how risk assessments were conducted for the Washington Bridge's critical areas.
9. Based on industry standards, what should be the frequency and scope of inspections pertaining to the post-tensioning system for a bridge with a design such as the Washington Bridge?
10. What methods should have been employed to properly assess the condition of the post-tensioned cables and grout during Your work on the Washington Bridge?
11. Based on AECOM's 2014 inspection and design plans, what critical issues should have been addressed in the proposed rehabilitation?
12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

PETER F. NERONHA
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/s/ Theodore J. Leopold

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT STEERE ENGINEERING, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant STEERE ENGINEERING, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

including the right to serve additional interrogatories related to the subjects below, or on any other subject.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Rhode Island Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to the interrogatories set forth herein (hereinafter, the “Interrogatories”).

2. As used in the Interrogatories, the following terms are to be interpreted in accordance with the following definitions:

- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means STEERE ENGINEERING, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

3. The terms used in the Interrogatories should be construed as broadly as possible to the fullest extent of their meaning in a good faith effort to comply with the Superior Court Rules of Civil Procedure. Unless words or terms have been given a specific definition herein, each word or term used shall herein be given its usual and customary dictionary definition except where such words have a usual custom or usage definition in your trade or industry, in which case they shall be interpreted in accordance with such usual custom and usage definition of which you are aware.

4. Any reference to any individual or entity herein includes all predecessors or successors in interest of said individual or entity and all principals, agents, former and current

employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

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other; (viii) the author's title or position; and (ix) the basis for the privilege objection.

7. An Interrogatory that asks you to identify documents requires you to provide at least the following: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the author(s), addressee(s) and recipient(s) of the document; and (e) the location(s) of the document.

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10. These Interrogatories are continuing in nature, so that if you subsequently discover or obtain additional information, then you are obligated to supplement your responses to these Interrogatories promptly and provide later discovered responsive information up to the day of trial.

INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
4. Which descriptions of deterioration in the February 26, 2024 VN Engineers Report, if any, were You and Your subconsultants aware of during Your respective Involvement with the Washington Bridge?
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9. Based on industry standards, what should be the frequency and scope of inspections pertaining to the post-tensioning system for a bridge with a design such as the Washington Bridge?
10. What methods should have been employed to properly assess the condition of the post-tensioned cables and grout during Your work on the Washington Bridge?
11. Based on AECOM's 2014 inspection and design plans, what critical issues should have been addressed in the proposed rehabilitation?
12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

PETER F. NERONHA
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dmartin@cohenmilstein.com
prazavi@cohenmilstein.com
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/s/ Jonathan N. Savage

Jonathan N. Savage, Esq. (#3081)
Michael P. Robinson, Esq. (#6306)
Edward D. Pare III, Esq. (#9698)
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Fax: (401) 648-6748
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mrobinson@savagelawpartners.com
epare@savagelawpartners.com

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT TRANSYSTEMS CORPORATION**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, Plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant TRANSYSTEMS CORPORATION, (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

including the right to serve additional interrogatories related to the subjects below, or on any other subject.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Rhode Island Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to the interrogatories set forth herein (hereinafter, the “Interrogatories”).

2. As used in the Interrogatories, the following terms are to be interpreted in accordance with the following definitions:

- (a) “RIDOT” refers to the Rhode Island Department of Transportation.
- (b) “Washington Bridge” references the I-195 westbound bridge as described in the Amended Complaint.
- (c) “Defendant” means TRANSYSTEMS CORPORATION, and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) “You” or “your” means Defendant.

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employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

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INTERROGATORIES

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12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza
PETER F. NERONHA
ATTORNEY GENERAL
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/s/ Theodore J. Leopold
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/s/ Jonathan N. Savage
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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,)	
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MICHAEL BAKER INTERNATIONAL, INC.,)	
PRIME AE GROUP, INC.,)	
STEERE ENGINEERING, INC.,)	
TRANSYSTEMS CORPORATION, AND)	
VANASSE HANGEN BRUSTLIN, INC.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF INTERROGATORIES TO
DEFENDANT VANASSE HANGEN BRUSTLIN, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 33, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant VANASSE HANGEN BRUSTLIN, INC., (“Defendant”) provide answers to these interrogatories within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing. The information herein requested includes not only that personally known or available to Defendant but also information known or available to Defendant’s attorneys, agents, servants, employees, representatives, private investigators, and others who are in possession of or who may have obtained information or materials for or on behalf of Defendant. Plaintiff reserves all rights regarding future interrogatories,

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- (d) “You” or “your” means Defendant.

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employees, and all other persons acting on behalf of, or at the direction of, the individual or entity, including, but not limited to, attorneys, representatives, or consultants.

5. If, after a reasonable and thorough investigation, using due diligence, you are unable to answer any Interrogatory, or any part thereof, on the ground of lack of information available to you, specify in full and complete detail why the information is not available to you and what has been done to locate such information. In addition, specify what knowledge or belief you have concerning the unanswered portion of any Interrogatory and set forth the facts upon which such knowledge or belief is based.

6. If any portion of an Interrogatory response is withheld on the ground of privilege or any other objection, then for each such response describe the privilege or objection being asserted and provide information sufficient to permit the Court to rule on your privilege claim in accordance with the Rhode Island Superior Court Rules of Civil Procedure. For each assertion of the privilege, state the nature of the privilege, and the privilege rule being invoked.

- (a) If the privilege applies to an oral Communication, then state (i) the name of the person making the Communication and the names of all persons present while the Communication was made, and if not apparent, the relationships of all persons present for the Communication; (ii) the date and place of the Communication; and (iii) the general subject matter of the Communication.
- (b) If the privilege applies to one or more Documents, then state separately for each such Document: (i) the type of Document (*e.g.*, letter, memorandum, email, report, recording, etc.); (ii) the Document's general subject matter; (iii) the Document's date; (iv) its author; (v) its addressees, if any; (vi) any other recipients of the Document; (vii) the relationship of the author, addressees, and recipients to each

other; (viii) the author's title or position; and (ix) the basis for the privilege objection.

7. An Interrogatory that asks you to identify documents requires you to provide at least the following: (a) the type of document; (b) the general subject matter of the document; (c) the date of the document; (d) the author(s), addressee(s) and recipient(s) of the document; and (e) the location(s) of the document.

8. An Interrogatory that asks you to identify persons requires you to provide at least the following: (a) the person's full name; (b) the person's present or last known address and telephone number; and (c) when referring to a natural person, the person's present or last known place of employment.

9. An Interrogatory that asks you to identify communications requires you to provide at least the following: (a) for communications reflected in written documents the information you are required to provide in response to an interrogatory that asks you to identify documents, or (b) for all other communications, (i) the name of the person making the communication and the names of persons present while the communication was made; (ii) the date and place of communication; and (iii) the general subject matter of the communication.

10. These Interrogatories are continuing in nature, so that if you subsequently discover or obtain additional information, then you are obligated to supplement your responses to these Interrogatories promptly and provide later discovered responsive information up to the day of trial.

INTERROGATORIES

1. How does the presence of voids in the grout surrounding the post-tensioning cables impact the Washington Bridge's structural integrity?
2. What are the potential consequences of corrosion in the post-tensioning cables, and how does this affect the Washington Bridge's safety?
3. During the rehabilitation design project (RIDOT RFP/Bid No. 7461338), was any strengthening in the form of external post-tensioning considered by You? If so, why did You not recommend it?
4. Which descriptions of deterioration in the February 26, 2024 VN Engineers Report, if any, were You and Your subconsultants aware of during Your respective Involvement with the Washington Bridge?
5. Identify RIDOT's oversight provided to You during Your work on the Washington Bridge.
6. Identify how You monitored contractors' compliance with maintenance standards regarding the Washington Bridge.
7. Identify all steps taken by You in evaluating the Washington Bridge's fracture-critical elements.
8. Identify how risk assessments were conducted for the Washington Bridge's critical areas.
9. Based on industry standards, what should be the frequency and scope of inspections pertaining to the post-tensioning system for a bridge with a design such as the Washington Bridge?
10. What methods should have been employed to properly assess the condition of the post-tensioned cables and grout during Your work on the Washington Bridge?
11. Based on AECOM's 2014 inspection and design plans, what critical issues should have been addressed in the proposed rehabilitation?
12. Do you contend that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint?

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT AETNA BRIDGE COMPANY**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant AETNA BRIDGE COMPANY, produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means AETNA BRIDGE COMPANY and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT ARIES SUPPORT SERVICES, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant ARIES SUPPORT SERVICES, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means ARIES SUPPORT SERVICES, INC., produce and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel,

secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other

disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the

document was sent, and the date the document was received; and (v) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT BARLETTA HEAVY DIVISION, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant BARLETTA HEAVY DIVISION, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means BARLETTA HEAVY DIVISION, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND'S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT COLLINS ENGINEERS, INC**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island ("Plaintiff") requests that defendant COLLINS ENGINEERS, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means COLLINS ENGINEERS, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT COMMONWEALTH ENGINEERS &
CONSULTANTS, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant COMMONWEALTH ENGINEERS & CONSULTANTS, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means COMMONWEALTH ENGINEERS & CONSULTANTS, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT AECOM TECHNICAL SERVICES, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant AECOM TECHNICAL SERVICES, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means AECOM TECHNICAL SERVICES, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel,

secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other

disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the

document was sent, and the date the document was received; and (v) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT JACOBS ENGINEERING GROUP, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant JACOBS ENGINEERING GROUP, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means JACOBS ENGINEERING GROUP, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Theodore J. Leopold

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/s/ Jonathan N. Savage

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epare@savagelawpartners.com

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH
PHASE 2 JV**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV, produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV, and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel,

secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other

disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the

document was sent, and the date the document was received; and (v) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years for the Washington Bridge.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.
- 20) All documents in support of Your contention in paragraph 11 of Your Counterclaim which states: "Radiographic, ground penetrating radar ("GPR"), ultrasonic shear wave tomography ("MIRA"), and/or other testing was available to evaluate the true condition of the Washington Bridge after 1999 and before March 17, 2021."
- 21) All documents, including internal communications, meeting notes, and analyses, in which the JV or its members discussed, evaluated, or relied upon any representations by RIDOT regarding the condition or rehabilitatability of the Washington Bridge, including but not limited to the Base Technical Concept (BTC) and the 2021 RFP.
- 22) All documents and communications within the JV or between the JV and third parties concerning the 1992 Lichtenstein report, its recommendations, or the absence of its disclosure in the 2021 RFP.
- 23) All documents reflecting any consideration, performance, or rejection of additional non-visual testing (such as radiographic, GPR, MIRA, or ultrasonic testing) by the JV or its consultants prior to or during the Project, and any communications with RIDOT regarding such testing.

- 24) All documents relating to the identification, notification, and assessment of the alleged Differing Site Condition at Piers 6 and 7, including internal reports, correspondence with RIDOT, and any analyses of the impact on design, construction, or schedule.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza
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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT MICHAEL BAKER INTERNATIONAL, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant MICHAEL BAKER INTERNATIONAL, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means MICHAEL BAKER INTERNATIONAL, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Theodore J. Leopold

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/s/ Jonathan N. Savage

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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT PRIME AE GROUP, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant PRIME AE GROUP, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means PRIME AE GROUP, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

PETER F. NERONHA
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT STEERE ENGINEERING, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant STEERE ENGINEERING, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means STEERE ENGINEERING, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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trichardson@cohenmilstein.com
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/s/ Jonathan N. Savage

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epare@savagelawpartners.com

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT TRANSYSTEMS CORPORATION**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant TRANSYSTEMS CORPORATION, , produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means TRANSYSTEMS CORPORATION, and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza
PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July 2025, I electronically served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Michael P. Robinson

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND)	
)	
<i>Plaintiff,</i>)	
)	
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.,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF STATE OF RHODE ISLAND’S FIRST SET OF REQUESTS FOR
PRODUCTION TO DEFENDANT VANASSE HANGEN BRUSTLIN, INC.**

Pursuant to Rhode Island Superior Court Rules of Civil Procedure 26 and 34, plaintiff the State of Rhode Island (“Plaintiff”) requests that defendant VANASSE HANGEN BRUSTLIN, INC., produce the following documents for inspection and copying, within forty (40) days of service, at the offices of Savage Law Partners, LLP, 564 South Water Street, Providence, RI 02903, or at such other location that the parties may mutually designate in writing.

DEFINITIONS AND INSTRUCTIONS

1. The definitions and rules of construction set forth in Superior Court Rules of Civil Procedure are hereby incorporated and shall apply to Plaintiff's First Set of Requests for Production (hereinafter, the "Requests"). These definitions shall apply throughout the Requests without regard to capitalization.

2. As used in the Requests, the following terms are to be interpreted in accordance with the following definitions:

- (a) "RIDOT" refers to the Rhode Island Department of Transportation.
- (b) "Washington Bridge" references the I-195 westbound bridge as described in the Amended Complaint.
- (c) "Defendant" means VANASSE HANGEN BRUSTLIN, INC., and all of its parents, U.S. and non-U.S. subsidiaries, divisions, affiliates, predecessors, successors, officers, directors, employees, agents, partners, limited partners, and independent contractors, as well as aliases, trade names, or business names used by, or formerly used by, any of the foregoing.
- (d) "Electronically stored information" or "ESI" refers to any portion of data available on a computer or other device capable of storing electronic data. "Electronically stored information" includes, but is not limited to, email (whether conducted using company email addresses or conducted through an individual, non-company account (*e.g.*, Gmail)), spreadsheets, databases, word processing documents, images, presentations, application files, executable files, log files, and all other files present on any type of device capable of storing electronic data. Devices capable of storing electronically stored information include, but are not limited to: servers, desktop computers, portable computers, handheld computers, flash memory devices, wireless communication devices, pagers, workstations, minicomputers, mainframes, and all other forms of online or offline storage, whether on or off company premises. ESI is meant to include instant messages, cell phone text messages, voicemail messages, and similar types of messages. ESI is also meant to include any records of such communications or messages, including phone records. For any document kept in electronic form, the term "document" includes any metadata associated with the document.
- (e) "Employee" means, without limitation, current and former officers, directors, executives, managers, analysts, supervisors, department heads, sales personnel, secretaries, clerical staff, messengers, agents, attorneys, representatives, or any person acting or authorized to act on behalf of Defendant.

(f) “Person” is defined as any natural person or any business, legal, or governmental entity or association.

(g) “You” or “your” means Defendant.

3. All documents produced for inspection shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the particular document requests, as required by Rhode Island Superior Court Rules of Civil Procedure. Documents attached to one another shall not be separated for production, the sequence of the documents shall not be disturbed from the condition in which they are normally kept, and all folders and containers for the documents shall be produced as well as the documents in the folders and containers.

4. In producing documents and ESI, you are requested to furnish all documents, ESI, or things in your possession, custody or control, regardless of the physical location of the documents or ESI, or whether such documents or ESI or other materials are possessed directly by you or your current and former directors, officers, agents, employees, representatives, subsidiaries, managing agents, affiliates, investigators, or by your current and former attorneys or their agents, employees, representatives, or investigators.

5. All ESI shall be produced in a format to be agreed upon by the parties.

6. Any alteration of a requested document, including any marginal notes, handwritten notes, underlining, date stamps, received stamps, endorsed or filed stamps, drafts, revisions, modifications and other versions of a final document, is a separate and distinct document and should be produced.

7. If you object to any of these Requests, state your specific objection and clearly indicate whether you are complying with the request notwithstanding your objection, pursuant to

the requirements of the Rhode Island Superior Court Rules of Civil Procedure. If your objection goes to only part of the request, produce all documents that do not fall within the scope of your objection and respond to the remainder of the request to which you do not object. If you object to any request on the ground of overbreadth, you shall respond to the request as narrowed to conform to your objection within the time period allowed for a response.

8. If no documents responsive to a request exist, please state that no responsive documents exist.

9. Regardless of any verb tense used in the document requests, these Requests are intended to cover all documents in existence or effect at any time during the Relevant Time Period. That is, in the event that the documents responsive to a request have changed over the time period for which the request has been made, produce all responsive documents even if they reflect policies that are no longer in effect.

10. If any documents or parts of documents called for by these Requests have been destroyed, discarded, or otherwise disposed of, you should produce a copy of your document retention policy applicable during the Relevant Time Period and provide a list setting forth as to each such document the following information: (a) The nature of the document (*e.g.*, email, memorandum, etc.); (b) The name, address, occupation, title, and business affiliation of each person who prepared, received, viewed, has knowledge of the contents of, or had possession, custody, or control of the document; (c) The date of the document; (d) The identification number of the document, if any; (e) A description of the subject matter of the document; (f) The date of destruction or other disposition; (g) A statement of the reasons for destruction or other disposition; (h) The name, address, occupation, title, and business affiliation of each person who authorized destruction or other disposition; (i) The name, address, occupation, title, and business

affiliation of each person who destroyed or disposed of the document; and (j) The request or requests to which the document is responsive.

11. You are specifically instructed to search all document management systems, computer archives, and/or backup tapes or disks for documents responsive to the following requests, and production of such documents should be made regardless of whether such documents exist in tangible or “hard” copy form. Production is also sought regardless of whether the user purported to “delete” the document, if such document is capable of being retrieved from archives and/or backup tapes or disks.

12. If you contend or believe that a privilege or other protection enables you to withhold any document sought by a request, you must produce a log containing the following information: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) The basis for claiming the privilege or protection as to the specific information or document involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party, to assess the claim; (d) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (e) The following information about the purportedly privileged document: (i) The author, primary addressee, and secondary addressee or persons copied, including the relationship of those persons to any party in this litigation and/or author of the document; (ii) A brief description sufficient to identify the type, subject matter, and purpose of the document; (iii) All persons to whom its contents have been disclosed; (iv) The date the document was prepared, the date the document was sent, and the date the document was received; and (v) Other information sufficient

to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

13. If a portion of any document responsive to these Requests is withheld under a claim of privilege pursuant to the preceding instruction, any non-privileged portion of such document must be produced with the portion claimed to be privileged redacted. For each such document, please provide a redaction log identifying: (a) The nature of the privilege or protection claimed; (b) The nature and identity of the attorney (or other appropriate party) with respect to whom the privilege or protection is claimed; (c) A brief description sufficient to identify the type, subject matter, and purpose of the redacted information; (d) The basis for claiming the privilege or protection as to the specific information involved in a manner that, without revealing information itself privileged or protected, will enable the non-producing party to assess the claim; (e) Each person who has knowledge of such information or to whom such information has been communicated in any way at any time; and (f) Other information sufficient to enable a full assessment of the applicability of the privilege or protection claims, as required by the Rhode Island Superior Court Rules of Civil Procedure.

14. These Requests are continuing in nature and you are required to supplement your responses to these Requests in a continuing and timely manner. Accordingly, if you obtain or become aware of additional information or responsive documents at any time after serving a response, you are required to promptly serve a further response supplementing or revising your initial response and provide such additional responsive documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

- 1) All communications You have had with RIDOT pertaining to voids in the grout surrounding the post-tensioning cables regarding the Washington Bridge.
- 2) All communications You have had with RIDOT pertaining to corrosion concerns with any component of the post-tensioning system of the Washington Bridge, including but not limited to the post-tensioned cables.
- 3) All time sheets for each engineer involved in any project performed by You or Your contractors on the Washington Bridge.
- 4) All supporting data used for any reports You prepared during the work you performed on the Washington Bridge, including test data, inspection data, internal notes, and records.
- 5) All documents related to the evaluation of the existing cantilever beams at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 6) All documents related to the evaluation of the existing tie-down assemblies at Abutment 1, piers 2-6, and piers 8-13 in Your possession, including but not limited to the names, dates, and hours for Your employees and subconsultant employees related to this topic and all meetings and correspondence related to this topic.
- 7) All internal memoranda, emails, reports, meeting minutes, and other communications documenting Your concerns about the Washington Bridge's structural integrity at any point in time.
- 8) All inspection reports, engineering analyses, test results, and other documents that identify, describe, or evaluate the presence of voids in the concrete grout surrounding the post-tensioning cables, including any documents that assess how these voids impact the Washington Bridge's structural integrity.
- 9) All engineering reports, risk assessments, analyses, and other documents that discuss or evaluate the potential consequences of corrosion in the post-tensioning cables and/or how this affects the Washington Bridge's safety.
- 10) All inspection reports, photographs, field notes, correspondence, and other documents identifying deficiencies in any inspections of the Washington Bridge.
- 11) All documents related to inspections of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.
- 12) All documents related to strategies for rehabilitation of the existing Washington Bridge that were considered but not performed due to cost, constructability, traffic interruptions, and/or other reasons.

- 13) All documents, including but not limited to policies, procedures, correspondence, meeting minutes, inspection protocols, and oversight reports that identify RIDOT's oversight provided during Your work with the Washington Bridge.
- 14) All documents, including but not limited to inspection protocols, reports, analyses, test results, and correspondence related to Your evaluation of the Washington Bridge's fracture-critical elements.
- 15) All documents, including but not limited to risk assessment protocols, reports, analyses, and resulting recommendations related to risk assessments conducted for the Washington Bridge's critical areas.
- 16) All documents, including but not limited to inspection protocols, testing methodologies, equipment specifications, and industry standards that describe methods that should have been employed to properly assess the condition of the post-tensioned cables and grout over the years.
- 17) All documents, including but not limited to internal reviews, third-party evaluations, and correspondence that reference any potential oversights or errors in the various inspections and rehabilitation plans developed for the Washington Bridge.
- 18) All contracts, agreements, correspondence, and other documents that define the roles and responsibilities of the various engineering firms involved in inspecting and designing repairs for the Washington Bridge over the years.
- 19) All documents in support of Your contention that any other entity is liable, in whole or in part, for any of the allegations asserted against You in the Amended Complaint.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
ATTORNEY GENERAL
STATE OF RHODE ISLAND

/s/ Stephen N. Provazza

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/s/ Michael P. Robinson