

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

STATE OF RHODE ISLAND,)
)
Plaintiff,)
)
v.)
)
AECOM TECHNICAL SERVICES, INC.,)
AETNA BRIDGE COMPANY,)
ARIES SUPPORT SERVICES INC.,)
BARLETTA HEAVY DIVISION, INC.,)
BARLETTA/AETNA I-195 WASHINGTON)
BRIDGE NORTH PHASE 2 JV,)
COLLINS ENGINEERS, INC.,)
COMMONWEALTH ENGINEERS &)
CONSULTANTS, INC.,)
JACOBS ENGINEERING GROUP, INC.,)
MICHAEL BAKER INTERNATIONAL, INC.)
PRIME AE GROUP, INC.,)
STEERE ENGINEERING, INC.,)
TRANSYSTEMS CORPORATION, and)
VANASSE HANGEN BRUSTLIN, INC.,)
)
Defendants.)

C.A. No. PC-2024-04526
Business Calendar

**PLAINTIFF STATE OF RHODE ISLAND'S SUPPLEMENTAL RESPONSES TO
DEFENDANT VANASSE HANGEN BRUSTLIN, INC.'S REQUEST FOR
PRODUCTION DATED NOVEMBER 12, 2024**

Pursuant to Rule 34 of the Superior Court Rule of Civil Procedure, now comes the Plaintiff, State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following Supplemental Responses to Defendant, Vanasse Hangen Brustlin, Inc.'s Request for Production dated November 12, 2024:

REQUEST NO. 1

All documents upon which you rely in support of the claims made in the Complaint.

SUPPLEMENTAL RESPONSE:

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT_000022354 RIDOT_000049737 produced contemporaneously with this Supplemental Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

REQUEST NO. 4

Any and all documents which evidence, reflect or reference any communications, including, without limitation, reports, tape recordings, minutes, transcripts, correspondence, memoranda, notes, or transmittals, and emails by and between you and any other person or entity concerning the events referred to in the Complaint.

SUPPLEMENTAL RESPONSE:

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT_000022354 RIDOT_000049737 produced contemporaneously with this Supplemental Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

REQUEST NO. 23

All documents concerning any communications, meetings or discussions (including, without limitation, correspondence, e-mails, notes and internal memoranda), that occurred between you and any party in this case.

SUPPLEMENTAL RESPONSE:

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work

product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT_000022354 RIDOT_000049737 produced contemporaneously with this Supplemental Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

REQUEST NO. 26

Any and all documents which you allege support your claims as set forth in the Complaint.

SUPPLEMENTAL RESPONSE:

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT_000022354 RIDOT_000049737 produced contemporaneously with this Supplemental Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

REQUEST NO. 27

All photographs, films, diagrams, videotapes, depictions or any other documents concerning the allegations in the Complaint.

SUPPELMENTAL RESPONSE:

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT_000022354 RIDOT_000049737 produced contemporaneously with this Supplemental Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this

Response pending the outcome of further investigation and discovery.

REQUEST NO. 30

Any and all documents concerning inspections of the Bridge's post-tensioned cantilever beams and/or tie down rods from the time of the Bridge's original construction to present.

SUPPLEMENTAL RESPONSE:

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT_000022354 RIDOT_000049737 produced contemporaneously with this Supplemental Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

REQUEST NO. 31

Any and all documents related to and/or documenting inspections completed by the State's Bridge Maintenance Division from the time of the Bridge's original construction to present.

SUPPLEMENTAL RESPONSE:

The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see BATES RIDOT_000022354 RIDOT_000049737 produced contemporaneously with this Supplemental Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

Respectfully Submitted,
Plaintiff,
State of Rhode Island,
By its Attorneys,

/s/ Stephen N. Provazza

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of August 2025, I electronically served this document through the electronic filing system on counsel of record. The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Edward D. Pare III