

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 RESPONSES TO DEFENDANT VANASSE
HANGEN BRUSTLIN, INC.'S SECOND REQUEST FOR PRODUCTION DATED
JUNE 2, 2025**

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 Responses to Defendant, Vanasse Hangen Brustlin, Inc.'s Second Request for Production dated June 2, 2025:

32. All documents concerning all allegations in paragraph 102 of the Complaint that the increased traffic volume has resulted in physical wear and tear damage to the East Bound Washington Bridge.

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 attached responsive documents Bates number: RIDOT_000049738-RIDOT_000049852.

33. All documents concerning the allegations in paragraph 103 of the Complaint that there has been wear and tear to the East Bound Washington Bridge that would not have otherwise occurred.

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 attached responsive documents Bates number: RIDOT_000049738-RIDOT_000049852.

34. All documents concerning the allegation in paragraph 104 of the Complaint that repairs to physical aspects of the East Bound Washington Bridge are required on a much more frequent basis than they would have otherwise been required.

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 attached responsive documents Bates number: RIDOT_000049738-RIDOT_000049852.

35. All documents relating to the allegations in paragraph 105 of the Complaint that physical maintenance is required on a more frequent basis to keep the East Bound Washington Bridge in safe operation condition.

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 attached responsive documents Bates number: RIDOT_000049738-RIDOT_000049852.

36. All documents concerning the allegations in paragraph 106 of the Complaint related to advanced monitoring systems including real time sensors and structural health monitoring equipment.

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 attached responsive documents Bates number: RIDOT_000049738-RIDOT_000049852.

37. All documents concerning specifically any damages you allege as a result of the allegations regarding alleged additional physical wear and tear damage to the eastbound bridge as generally alleged in paragraph 96 through 106 of the complaint. This request is specifically seeking documents and information relating to damages to the eastbound bridge and not related to any damages relating specifically to the westbound bridge.

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 attached responsive documents Bates number: RIDOT_000049738-RIDOT_000049852.

38. All documents concerning the allegations contained in paragraph 186 of the complaint that VHB specifically and negligently failed to do or not to any of the items or activities contained in (a) through (g).

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 attached responsive documents Bates number: RIDOT_000049738-RIDOT_000049852.

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

/s/ Stephen N. Provazza

Sarah W. Rice, Esq. (#10588)
Stephen N. Provazza, Esq. (#10435)
Assistant Attorneys General
Rhode Island Office of the Attorney General
150 S. Main Street
Providence, RI 02903
Tel: (401) 274-4400
srice@riag.ri.gov
sprovazza@riag.ri.gov

/s/ Theodore J. Leopold

Theodore J. Leopold (admitted *pro hac vice*)
Leslie M. Kroeger (admitted *pro hac vice*)
Diana L. Martin (admitted *pro hac vice*)
Poorad Razavi (admitted *pro hac vice*)
Takisha Richardson (admitted *pro hac vice*)
Adnan Toric (admitted *pro hac vice*)
Cohen Milstein
11780 U.S. Highway One
Suite N500
Palm Beach Gardens, FL 33408
[tleopold@cohenmilstein.com](mailto:t Leopold@cohenmilstein.com)
lkroeger@cohenmilstein.com
dmartin@cohenmilstein.com
prazavi@cohenmilstein.com
trichardson@cohenmilstein.com
atoric@cohenmilstein.com

/s/ Jonathan N. Savage

Jonathan N. Savage, Esq. (#3081)

Michael P. Robinson, Esq. (#6306)

Edward D. Pare III, Esq. (#9698)

Savage Law Partners, LLP

564 South Water Street

Providence, RI 02903

Tel: (401) 238-8500

Fax: (401) 648-6748

js@savagelawpartners.com

mrobinson@savagelawpartners.com

epare@savagelawpartners.com

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