

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 ANSWERS TO DEFENDANT VANASSE  
HAGEN BRUSTLIN, INC'S SECOND SET OF INTERROGATORIES  
DATED JUNE 2, 2025**

Pursuant to Rules 26 and 33 of the Superior Court Rules of Civil Procedure, now comes the Plaintiff, the State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following responses to Defendant Vanasse Hangen Brustlin, Inc.'s Second Set of Interrogatories dated June 2, 2025.

**PLAINTIFF'S RESPONSES TO DEFENDANT VANASSE HANGEN BRUSTLIN, INC'S  
INTERROGATORIES DATED JUNE 2, 2025**

15. State the basis for the allegation in paragraph 103 of the Complaint, that there has been wear and tear to the east bound bridge that would not have otherwise occurred and quantify or explain using actual metrics and/or other scientific calculations how to measure this alleged increased wear and tear that would not have otherwise occurred.

**RESPONSE:**

**Plaintiff objects to the extent this Interrogatory seeks information that is protected by the attorney-client privilege, deliberative process privilege, and/or the work-product doctrine. Subject to said objections and without waiving same, Bridge 020001 ("Bridge 200") was designed to handle 6 lanes of traffic. However, since its opening in 2008 and prior to closure of Washington Bridge 070001 ("Bridge 700"), the Rhode Island Department of Transportation (the "Department") was utilizing 5 lanes of travel on Bridge 200 with traffic volume of 90,000 Average Daily Traffic (ADT). Since the closure of Bridge 700, the Department added a 6<sup>th</sup> lane of travel to Bridge 200 and now has 160,000 ADT, which encompasses the full design capacity of Bridge 200.**

**Furthermore, the increased maintenance activities on Bridge 200 have required replacement of scupper grates, additional deck spall repairs due to the increased ADT, and additional work orders for Bridge 200.**

**Pursuant to Rule 33(d) of the Superior Court Rules of Civil Procedure, please also see State's Response to VHB's Second Request for Production of Documents, Bates number: RIDOT\_000049738- RIDOT\_000049852.**

16. Identify all repairs to physical aspects of the east bound bridge as alleged in paragraph 104 of the Complaint that would not have otherwise been required but for the allegations you have made in this lawsuit and describe in as much specificity as possible the cost of said repairs.

**RESPONSE:**

**Pursuant to Rule 33(d) of the Superior Court Rules of Civil Procedure, please see State's Response to VHB's Second Request for Production of Documents, Bates number: RIDOT\_000049738- RIDOT\_000049852.**

17. Identify all maintenance that has been done as alleged in paragraph 105 of the Complaint as a result of the allegations you have made in this lawsuit that has been done but would not have been done but for the closure of the west bound bridge.

**RESPONSE:**

**Plaintiff objects to the extent this Interrogatory seeks information that is protected by the attorney-client privilege, deliberative process privilege, and/or the work-product doctrine. Subject to said objections and without waiving same, see Response to Interrogatory 15 and pursuant to Rule 33(d) of the Superior Court Rules of Civil Procedure, the State's Response to VHB's Second Request for Production of Documents, Bates number: RIDOT\_000049738- RIDOT\_000049852.**

18. State the basis for the allegation in paragraph 106 of the Complaint and identify all Monitoring systems, sensors, etc., referenced in that paragraph including the cost and time to operate same.

**RESPONSE:**

**Bridge 200 was designed to handle 6 lanes of traffic; however since its opening in 2008 and prior to closure of Bridge 700, the Department was only utilizing 5 lanes of travel on Bridge 200 with traffic volume of 90,000 Average Daily Traffic (ADT). Since the closure of Bridge 700, the Department added a 6th lane of travel to Bridge 200 and now has 160,000 ADT, its full design capacity. Moreover, because of the closure and replacement of Bridge 700, which resulted in the use of Bridge 200 at its full design capacity for the first time, the Department installed the WIM/SHIM systems. This system was designed to reduce maintenance costs, improve safety, and extend the bridge's lifespan by identifying issues early. The Weigh in Motion system (WIM) gathers vehicle information including gross vehicle weight, axle loads, vehicle speed, vehicle classification, tire detection, advanced automated tire screening, as well as license plate pictures and DOT images for identification of vehicles. This data is combined with the SHIM to monitor the health of the structure. The data from the RIDOT Structural Monitoring System (SHIM), which includes 230 sensors that measure the stress and movement of Elements of the eastbound Washington Bridge 200, is used to assess the integrity of the bridge in real-time, detecting damage early and optimizing maintenance for analysis of the health of the structure and any changes in its condition.**

**See Response to #15 and State's Response to VHB second request for production of documents Bates number: RIDOT\_000049738- RIDOT\_000049852.**

19. State the basis for the allegation in paragraph 186 of the Complaint that VHB specifically failed to and/or had a duty to conduct each item referenced (a) – (g).

**RESPONSE:**

**Plaintiff notes Interrogatory 19 seeks the basis for allegations outlined in paragraph 186 of the Plaintiff's Amended Complaint, but references allegations outlined in paragraph 185. Plaintiff objects to the extent this Interrogatory seeks information that is protected by the attorney-client privilege, deliberative process privilege, and/or the work-product doctrine. Subject to said objections and without waiving same, Plaintiff directs VHB to the State of Rhode Island's Rules of Professional Conduct - Code of Ethics as noted in the Amended Complaint.**

I, Loren Doyle, under the pains and penalty of perjury, declare that the foregoing is true based upon matters within my personal knowledge and information that has been assembled and provided to me and that the answers provided are correct, according to the best of my knowledge.

By: Loren Doyle  
Loren Doyle

Dated: 8/22/2025

STATE OF RHODE ISLAND  
COUNTY OF PROVIDENCE

On this 22 day of August, 2025, before me, the undersigned notary, personally appeared Loren Doyle personally known to the notary, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his knowledge.

M. C. Beltram  
NOTARY PUBLIC  
My commission expires: 5/21/2028  
Notary identification number: 54513



As to Objections,  
Respectfully Submitted,  
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By its Attorneys,

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/s/ Theodore J. Leopold  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> 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