

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND,

Plaintiff,

v.

C.A. No. PC-2024-04526

AECOM TECHNICAL SERVICES, INC.,
AETNA BRIDGE COMPANY,
ARIES SUPPORT SERVICES INC.,
BARLETTA HEAVY DIVISION, INC.
BARLETTA/AETNA I-195 WASHINGTON
BRIDGE NORTH PHASE 2 JV,
COLLINS ENGINEERS, INC.
COMMONWEALTH ENGINEERS &
CONSULTANTS, INC.,
JACOBS ENGINEERING GROUP, INC.
MICHAEL BAKER INTERNATIONAL, INC.,
PRIME AE GROUP, INC.
STEERE ENGINEERING, INC.,
TRANSYSSTMS CORPORATION, and
VANASSE HANGEN BRUSTLION, INC.

Defendants.

JOINT STATUS REPORT

Now come the Plaintiff and the Defendants (together, the “Parties”), by and through their respective counsel, and pursuant to Section XVIII of the Scheduling Order entered on July 30, 2025 (the “Scheduling Order”), hereby submit this Joint Status Report in advance of the monthly conference scheduled for September 2, 2025:

1. At present, the Parties are actively engaged in the exchange of written discovery, consistent with the Court’s Scheduling Order.

2. Through the combined efforts of counsel, the Parties have also agreed upon a Rule 502(d) Order, which the Court entered on May 9, 2025.

3. The Parties have not, however, been successful in reaching a final agreement on the terms of the ESI Protocol that will govern the discovery of Electronically Stored Information in this case.

4. To that end, although the Parties have reached an agreement on the vast majority of the terms of a proposed ESI Protocol, the Parties have encountered an impasse on the scope of collection of ESI from electronic devices—namely, tablets and mobile devices.

5. To resolve that impasse, the Plaintiff has filed a Motion Seeking Implementation of the Plaintiff's Proposed ESI Protocol, which is scheduled for hearing on September 2, 2025 at 11:00 a.m.

Respectfully Submitted,
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The State of Rhode Island,
By Its Attorneys,
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CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of August, 2025, I electronically filed and 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/ Edward D. Pare III