

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 AECOM
TECHNICAL SERVICES, INC'S FIRST REQUEST FOR PRODUCTION DATED JUNE
12, 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, AECOM Technical Services, Inc.'s First Request for Production dated June 12, 2025:

1. The "Joint Venture Agreement dated June 23, 2020" referenced in Paragraph 6 of the Amended Complaint.

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 previously produced BATES RIDOT_000021448-RIDOT_000022353. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

2. The "Original Design" plans and other documents referenced in Paragraph 19 of the Amended Complaint.

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 previously produced BATES RIDOT_000000001-RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

3. The "Lichenstein Report" referenced in Paragraph 34 of the Amended Complaint.

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 previously produced BATES RIDOT_000012781-RIDOT_000012822. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

4. The routine inspection report MBI transmitted to RIDOT on August 3, 2011 referenced in Paragraph 43 of the Amended Complaint.

RESPONSE: See BATES RIDOT_000049921-RIDOT_000050804

5. The Request for Proposals for the "Complete Design Services for the Rehabilitation of the Washington Bridge North No. 700 – Mainline, Approach and Ramp Bridges Providence and East Providence, Rhode Island" that RIDOT

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issued on March 21, 2013 referenced in Paragraph 46 of the Amended Complaint.

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 previously produced BATES RIDOT_000016070-RIDOT_000016706. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

6. "AECOM's Letter of Interest/Technical Proposal" referenced in Paragraph 55 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000015501-RIDOT_000015676. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

7. The "2014 AECOM Contract" referenced in Paragraph 59 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000014963-RIDOT_000015000. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

8. The "2016 Construction Plans" referenced in Paragraph 63 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000019306-RIDOT_000019447. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

9. The "2019 AECOM Contract" referenced in Paragraph 76 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000021400-RIDOT_000021447. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

10. The “2019 Design-Build Solicitation” referenced in Paragraph 76 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000021400-RIDOT_000021447. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

11. The RFP/Bid No. 7611889 for the “Best Value Design-Build Procurement for Bridge Group 57T-10: I-95 Washing South Phase 2” that RIDOT issued on March 17, 2021 referenced in Paragraph 78 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000021552-RIDOT_000021841. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

12. The “Design-Build proposal” the Joint Venture submitted on July 2, 2021 referenced in Paragraph 82 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000021842-RIDOT_000022353. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

13. The “rehabilitation plans” issued by the Joint Venture referenced in Paragraph 91 of the Amended Complaint.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

14. All agreements entered into between You and any other party or third party relating to inspections or evaluations of the Washington Bridge during the time period of January 1, 1990 to present.

RESPONSE: See previously produced BATES RIDOT_000014963-RIDOT_000021842. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

15. All agreements entered into between You and any other party or third-party relating to the “1996-1998 Rehabilitation of the Washington Bridge” as referenced in Paragraph 40 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000000038-RIDOT_000014861. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

16. All bidding documents and proposals you received relating to the “1996-1998 Rehabilitation of the Washington Bridge” as referenced in Paragraph 40 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000000038-RIDOT_000014861. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

17. All plans, specifications, blueprints, schematics, drawings, and any other design or engineering documents relating to the “1996-1998 Rehabilitation of the Washington Bridge” as referenced in Paragraph 40 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000000038-RIDOT_000014861. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

18. All bidding documents and proposals You received relating to the Request for Proposals that RIDOT issued on March 21, 2013 as referenced in Paragraph 46 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000015001-RIDOT_000015149;16070-16706;15677-15706;16063;16070-17725;17730-17732. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

19. All plans, specifications, blueprints, schematics, drawings, and any other design or engineering documents relating to the Request for Proposals that RIDOT issued on March 21, 2013, as referenced in Paragraph 46 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000015001-RIDOT_000015149;16070-16706;15677-15706;16063;16070-17725;17730-17732. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

20. All Documents relating to RIDOT’s evaluation of the proposals and bids received in response to the March 21, 2013 Request for Proposals and all award decision-related documents.

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 previously produced BATES RIDOT_000015001-RIDOT_000015149;16070-16706;15677-15706;16063;16070-17725;17730-17732. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

21. All agreements entered into between You and any other party or third-party relating to the "2016 Rehabilitation Project" as referenced and described in Paragraph 66 of the Amended Complaint.

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. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT_0000019156- RIDOT_000021399. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

22. All request for proposals, plans, specifications, blueprints, schematics, drawings, and any other design or engineering documents relating to the "2016 Rehabilitation Project" as referenced and described in Paragraph 66 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000019156-RIDOT_000021399. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

23. All bidding and proposal documents you received relating to the "2021 RFP" as referenced and described in Paragraph 78 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000021840-RIDOT_000022353. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

24. All plans, specifications, blueprints, schematics, drawings, and any other design or engineering documents relating to the "2021 RFP" as referenced and described in Paragraph 78 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000021840-RIDOT_000022353;7954-7967;9323-9336. Discovery is ongoing, and the Plaintiff reserves the right to amend this

25. All Documents and Communications relating to the Request for Proposals (Solicitation # TRFP24004167) that RIDOT issued on April 26, 2024 for the Washington Bridge Demolition Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

26. All bidding documents and proposals You received relating to the Request for Proposals (Solicitation # TRFP24004195) that RIDOT issued on April 26, 2024 for the Washington Bridge Demolition Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

27. All contracts, subcontracts, and agreements entered into between You and any other party or third-party related to the demolition of the Washington Bridge, including those with J.R. Vinagro Corporation, Aetna Bridge Company, Jacobs Engineering Group, Inc., or any other contractor or consultant.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

28. All documents relating to RIDOT's evaluation of the proposals and bids received in response to the April 26, 2024 Request for Proposals and all award decision-related documents

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

29. All Communications between You and any contractor, subcontractor, or consultant regarding the demolition of the Washington Bridge.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

30. All internal Communications and Documents concerning the decision to demolish the Washington Bridge, including risk assessments, engineering evaluations, and cost-benefit analyses.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

31. All Communications and Documents between the State, RIDOT and any third-parties, including consultants, concerning the decision to demolish the Washington Bridge, including risk assessments, engineering evaluations, and cost-benefit analyses.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

32. All invoices, payment records, and financial documents reflecting costs incurred or anticipated costs for the demolition of the Washington Bridge, including the demolition itself, the design and planning of that demolition and all other work related thereto.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

33. All Documents and Communications relating to the Request for Proposals (Solicitation # TRFP24004195) that RIDOT issued on April 30, 2024 for the Washington Bridge Replacement Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

34. All bidding documents and proposals You received relating to the Request for Proposals (Solicitation # TRFP24004195) that RIDOT issued on April 30, 2024 for the Washington Bridge Replacement Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

35. All Documents and Communications discussing or analyzing the lack of response to Request for Proposals (Solicitation # TRFP24004195) that RIDOT issued on April 30, 2024 for the Washington Bridge Replacement Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

36. All Documents and Communications relating to revisions, re-scoping or reissuance of Request for Proposals for the Washington Bridge Replacement Project after Solicitation # TRFP24004195 did not receive any bids.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

37. All Documents and Communications relating to the Request for Proposals (Solicitation # TRFP25005022) that RIDOT issued on December 18, 2024 for the Washington Bridge Replacement Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

38. All bidding documents and proposals You received relating to the Request for Proposals (Solicitation # TRFP25005022) that RIDOT issued on December 18, 2024 for the Washington Bridge Replacement Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

39. All internal Communications and Documents concerning the decision to rebuild the Washington Bridge, including risk assessments, engineering evaluations, and cost-benefit analyses.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

40. All versions of the Request for Proposals issued by RIDOT for the Washington Bridge Replacement Project, including drafts, amendments, addenda, clarifications and final versions.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

41. All Communications between You and any potential or actual bidder regarding the Request for Proposals issued by RIDOT for the Washington Bridge Replacement Project, including pre-bid questions, clarifications, and post-submission discussions.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

42.All cost estimates, budget projections, and financial analyses prepared by or for RIDOT in connection with the Washington Bridge Replacement Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

43.All Communications between You and consultants, engineers, or financial advisors regarding projected or estimated costs for the Washington Bridge Replacement Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

44.All Documents and Communications related to funding sources, grant applications, or federal/state appropriations for the Washington Bridge Replacement Project.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

45.To the extent not produced, all agreements entered into by You and any other party or third-party relating to work performed on the Washington Bridge during the period of January 1, 1990 to the present.

RESPONSE: See previously produced BATES RIDOT_000000001-RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

46.All Documents and Communications relating to inspections of the Washington Bridge performed by any other party or third-party from January 1, 2013 to the present, including all draft and final reports, all notes, and all videos, scans, samples and photographs.

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 previously produced BATES 1909;2310-2315;2797-2966;4370-4382;5137-5148;5160-5172;5197-5206;5266-5301;5440-5450;5462-5471;5483-5493;5976-5985;6101-6113;6347-6394;6392-6443;6488-6490;6534-6538;6614;665106661;6705-6710;6721;6764-6771;6808-6822;6863-6870;6911-6917;6954;6991-6999;7000-7048;7088;7089-7097;7135;7140;7179-7187;7225-7234;7270-7279;7319-7327;7367-7376;7414-7423;7460-7469;7507-7516;7556-7563;7972-7982;8312-8317;9520;10236;10244;10300;10337;10338-10345;10450;10602;10751;10791-10798;10844;10889-10891;10935-10939;11103-11158;11211;11229-11237;11736-11738;13139-13157;13171-13175;13192-13196;14361-14396;14919-14920;14961. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

47.All reports prepared by or for the State of Rhode Island, RIDOT, or any agency of the State of Rhode Island, whether in draft or final form and all appendices thereto, in relation to the Washington Bridge, including, without limitation, the forensic analysis report WJE prepared in 2024.

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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

48.All Documents and Communications, including reports, prepared by or for the State of Rhode Island, RIDOT or any agency of the State of Rhode Island, by WJE, MBI, VN Engineers, Inc., VHB Engineers, Inc., Consor Engineers or Bridge Diagnostics, Inc. (collectively, individually or otherwise), whether in draft or final form, and all appendices thereto in relation to the 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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

49.All Documents and Communications the State of Rhode Island provided to any expert or consultant relating to the Washington Bridge between November 1, 2023 and the present.

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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

50.All Documents, Communications, notes, or comments, in your possession, custody or control relating to WJE and the Washington Bridge, that are not privileged.

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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

51.All Documents and Communications related to Michael Culmo and/or CHA Consulting, Inc.'s assessment, evaluation, inspection, analysis or rating of the 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 previously produced BATES RIDOT_000006284- RIDOT_000006287;9518. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

52.All Documents and Communications, including reports, records, notes, correspondence, photographs, scans and videos, relating to, or depicting any beam tie-downs or tension rods at the beam seats on piers 6 and 7 of the Washington Bridge during the time period of January 1, 2013 to the present.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

53.All Documents describing or showing any work performed on the beam seats or tie-down rods on piers 6 and 7 of the Washington Bridge during the time period of January 1, 2013 to the present.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

54.All Documents and Communications relating to recommendations for major repair work on the Washington Bridge during the period of January 1, 2013 to the present.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

55.All Documents and Communications relating to recommendations to replace and/or demolish the Washington Bridge from January 1, 2013 to the present.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

56.All Documents and Communications relating to VHB's investigation of the Washington Bridge on or after December 8, 2023.

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 previously produced VHB Folder. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

57.All Documents and Communications relating to RIDOT's decision to issue "an emergency declaration on December 11, 2023...closing the Washington Bridge" as alleged in Paragraph 94 of the Amended Complaint.

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 previously produced BATES: 4279;4515-4528;4656-4662;4736-4742;45233-5239;5266-5301;5763;6032-6045; 7672-7673;8942;9312-9313;11041-11046;11048-11057;40274-40729;40839-40851;41536-41548;41680-41681;41714. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

58.All Documents and Communications relating to the investigation, evaluation, rehabilitation, design or closure of the Washington Bridge from December 11, 2023 to the present.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

59.All Documents and Communications relating to the State's and RIDOT's efforts to preserve the allegedly damaged elements of the Washington Bridge, including any Documents relating to the removal of any elements of the Washington Bridge after the alleged discovery of the damaged tie-rods on or about December 8, 2023.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

60.All Documents and Communications relating to materials removed from the Washington Bridge, including, but not limited to, materials removed from the Washington Bridge by WJE, from December 1, 2023 to the present.

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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

61.All Documents and Communications relating to the State's and/or RIDOT's plans and decision to demolish and replace the Washington Bridge, including any and all Documents and Communications considering other options. The relevant time frame for this request is January 1, 1990 to the present.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

62.All Documents and Communications relating to the State's and/or RIDOT's decision to pause demolition of the Washington Bridge in September 2024, including, but not limited to, Documents and Communications related to materials that were removed from the 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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

63.All materials preserved, removed or otherwise in the possession of the State or RIDOT taken from the Washington Bridge in or around September 2024.

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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

64.All materials preserved, removed or otherwise in the possession of WJE on behalf of the State or RIDOT.

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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

65.All Documents and Communications relating to the State's allegation in Paragraph 61 of the Amended Complaint that AECOM's "reports failed to adequately recognize or address critical elements of the bridge's structural safety and integrity."

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. Subject to those objections, and without waiving the same, see previously produced AECOM FOLDER. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

66.All Documents and Communications relating to the State's allegation in Paragraph 65 of the Amended Complaint that the "2016 Construction Plans failed to identify, analyze, or recommend improvements 'necessary to completely rehabilitate the existing structure' as required by the 2014 AECOM Contract."

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. Subject to those objections, and without waiving the same, see previously produced AECOM FOLDER. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

67.All Documents and Communications relating to the State's allegation in Paragraph 66 of the Amended Complaint that the "State and Cardi Corporation...entered into a contract agreement to perform the construction portion of the 2016 Rehabilitation Project based on the design and plans of AECOM and its subconsultants."

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 previously produced CARDI FOLDER;19156-19305. Discovery is ongoing, and the Plaintiff reserves the right

to amend this Response pending the outcome of further investigation and discovery.

68.All Documents and Communications relating to the State's allegation in Paragraph 69 of the Amended Complaint that "none of the firms that conducted the inspections adequately recognized or addressed critical elements of the bridge's structural safety and integrity."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

69.All Documents and Communications relating to the "known deteriorating condition of the Washington Bridge" as referenced in Paragraph 71 of the Amended Complaint.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

70.All Documents and Communications relating to the State's allegation in Paragraph 79 of the Amended Complaint that the "concept for the 2021 RFP was to initiate a Design-Build project based on the 2019 Design Build Solicitation prepared by AECOM."

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 previously produced BATES RIDOT_000021400-21447;21552-21841;21842-22353;7954-7967;9323-9336. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

71.All Documents and Communications relating to the State's allegation in Paragraph 91 of the Amended Complaint that the "plans still did not address the existence of any possible problems relating to the tie-down rods at Piers 6 and 7 and did not call for repairs to the post- tensioning systems."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

72.The "2003-CB-061" contract referenced in Paragraph 99 of the Amended Complaint.

RESPONSE: Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

73.All Documents and Communications relating to rerouting westbound Washington Bridge traffic onto the Eastbound Washington Bridge following the closure of the Washington Bridge on December 8, 2023.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

74.All Documents and Communications relating to the State's allegation in Paragraph 103 of the Amended Complaint that there has been an increase in "traffic volume on the Eastbound Washington Bridge since the emergency closure of the 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 previously produced BATES RIDOT_000049738- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

75.All Documents and Communications identifying, supporting and/or quantifying the "physical wear and tear damage to the bridge[.]" alleged by the State in Paragraph 103 of the Amended Complaint.

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 previously produced BATES RIDOT_000049738- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

76.All Documents, Communications, reports or opinions regarding causes for the alleged increase in traffic volume on the Eastbound Washington Bridge since the emergency closure of the Washington Bridge on December 8, 2023.

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 previously produced BATES RIDOT_000049738- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

77.All Documents and Communications relating to maintenance and repair work performed on the Eastbound Washington Bridge during the time period of January 1, 1990 to the present.

RESPONSE: The Plaintiff objects to this Request because it is overly broad, burdensome, irrelevant to the issues in this matter, and 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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

78.All Documents and Communications related the State's decision to install equipment, sensors and/or monitoring systems relating to traffic volume on the Eastbound Washington Bridge during the time period of January 1, 1990 to the present.

RESPONSE: The Plaintiff objects to this Request because it is overly broad, burdensome, irrelevant to the issues in this matter, and 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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

79.All agreements entered into between You and any other party or third party relating to inspections, evaluations or construction of the Eastbound Washington Bridge during the time period of January 1, 1990 to the present.

RESPONSE: The Plaintiff objects to this Request because it is overly broad, burdensome, irrelevant to the issues in this matter, and 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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

80.All Documents and Communications relating to traffic data, including but not limited to traffic counts, flow analyses, and congestion reports for the Eastbound Washington Bridge during the time period of January 1, 1990 to the present.

RESPONSE: The Plaintiff objects to this Request because it is overly broad, burdensome, irrelevant to the issues in this matter, and 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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

81.All Documents and Communications relating to any alternative measures considered or implemented to mitigate the alleged increase in traffic volume on the Eastbound Washington Bridge following the emergency closure of the Washington Bridge on December 8, 2023.

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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

82.All Documents and Communications evidencing the State's allegation in Paragraph 109 of the Amended Complaint that AECOM breached the 2014 AECOM Contract.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

83.All Documents and Communications evidencing the State's allegation in Paragraph 110 of the Amended Complaint that "as a direct and proximate result of AECOM's breaches of the 2014 AECOM Contract, the State has suffered and will continue to suffer both physical damages to its property and economic damages...."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

84.All Documents identifying, supporting and quantifying the "physical damages and economic damages" the State alleges it has suffered and will continue to suffer as alleged in Paragraph 110 of the Amended Complaint.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

85.All Documents and Communications relating to the State's efforts to mitigate the State's alleged damages resulting from AECOM's alleged breaches of the 2014 AECOM Contract.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

86.All Documents and Communications evidencing the State's allegation in Paragraph 114 of the Amended Complaint that "AECOM, Steere, Prime, and Aries Support Services breached their duty of care."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

87.All Documents and Communications evidencing the State's allegation in Paragraph 115 that "AECOM was negligent in its inspections of the Washington Bridge in April 2014, and on July 28, 2015, October 27, 2017, July 24, 2019, July 22, 2020, and July 21, 2023."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

88.All Documents and Communications evidencing the State's allegation in Paragraph 117 of the Amended Complaint that "as a direct and proximate result of the negligence of AECOM, Steere, Prime, and Aries Support Services, the State has suffered and will continue to suffer both physical damages to its property and economic damages..."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

89.All Documents identifying, supporting and/or quantifying the "physical damages and economic damages" the State alleges it has suffered and will continue to suffer in Paragraph 117 of the Amended Complaint.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

90.All Documents and Communications relating to inspections, analyses, inspection reviews and reports performed by or on behalf of RIDOT or the State of Rhode

Island relating to the Washington Bridge and Eastbound 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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

91.All Documents and Communications evidencing the State's allegation in Paragraph 127 of the Amended Complaint that AECOM breached the 2019 AECOM Contract.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

92.All Documents and Communications evidencing the State's allegation in Paragraph 128 of the Amended Complaint that "as a direct and proximate result of AECOM's breaches of the 2019 AECOM Contract, the State has suffered and will continue to suffer both physical damages to its property and economic damages..."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

93.All Documents identifying, supporting and quantifying the “physical damages and economic damages” the State alleges it has suffered and will continue to suffer as alleged in Paragraph 128 of the Amended Complaint.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

94.All Documents and Communications relating to the State’s efforts to mitigate the State’s alleged damages resulting from AECOM’s alleged breaches of the 2019 AECOM Contract.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

95.All Documents and Communications evidencing the State’s allegation in Paragraph 132 of the Amended Complaint that in connection with the “2014 Contract”, AECOM “owed the State Fiduciary duties.”

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

96.All Documents and Communications that evidence the State's allegation in Paragraph 133 that by "agreeing to serve as RIDOT's Owner's Representative in connection with the 2019 Design-Build Proposal" AECOM "owed the State fiduciary duties."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

97.To the extent not already produced, all Documents and Communications that relate to any fiduciary duty the State alleges that AECOM owed to the State.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

98.All Documents and Communications evidencing the State's allegation in Paragraph 120 of the Amended Complaint that AECOM "breached its fiduciary duties to the State."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

99.All Documents and Communications evidencing the State's allegation in Paragraph 135 of the Amended Complaint that "as a direct and proximate result of AECOM's breaches of its fiduciary obligations to the State, the State has suffered and will continue to suffer both physical damages to its property and economic damages..."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

100.All Documents identifying, supporting and quantifying the "physical damages and economic damages" the State alleges it has suffered and will continue to suffer as alleged in Paragraph 135 of the Amended Complaint.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

101.The 2014 inspection contract referenced in Paragraph 155 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000015707- RIDOT_000015712.

102.The 2019 inspection contract referenced in Paragraph 155 of the Amended Complaint.

RESPONSE: See previously produced BATES RIDOT_000018747 RIDOT_000018753.

103.All Documents and Communications evidencing the State's allegation in Paragraph 157 of the Amended Complaint that AECOM "breached its inspection contracts..."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

104.All Documents and Communications evidencing the State's allegation in Paragraph 158 of the Amended Complaint that "as a direct and proximate result of AECOM's breaches of inspection contracts, the State has suffered and will continue to suffer both physical damages to its property and economic damages...."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

105.All Documents identifying, supporting and quantifying the “physical damages and economic damages” the State alleges it has suffered and will continue to suffer as alleged in Paragraph 158 of the Amended Complaint.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

106.All Documents and Communications relating to the State’s efforts to mitigate the State’s alleged damages resulting from AECOM’s alleged breaches of the 2019 AECOM Contract.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further

investigation and discovery.

107.All Documents and Communications relating to the State's allegation in Paragraph 191 of the Amended Complaint that "AECOM agreed to defend, indemnify, and hold harmless the State for all damages, losses, or expenses arising out of any of its acts or omissions, without regard for whether such damages, losses or expenses were foreseeable."

RESPONSE: See previously produced BATES RIDOT_000000001-RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

108.All Documents identifying, supporting and quantifying the "physical damages and economic damages" the State alleges it has suffered and will continue to suffer as alleged in Paragraph 194 of the Amended Complaint.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

109.All Documents and Communications related to and/or reflecting claimed or alleged misrepresentations of material fact that the State alleges AECOM made to RIDOT concerning the 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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff

reserves the right to amend this Response pending the outcome of further investigation and discovery.

110.All Documents and Communications related to and/or reflecting AECOM's claimed or alleged misrepresentations of familiarity with the needs of the Washington Bridge, including but not limited to proposals, marketing materials, and internal assessments.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

111.All Documents and Communications related to or reflecting AECOM's claimed or alleged misrepresentations of competence and experience necessary to rehabilitate and improve the Washington Bridge's structural performance, including resumes, qualifications, project histories, and performance evaluations.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

112.All Documents and Communications related to or reflecting AECOM's claimed or alleged representations of using industry standard concrete repair techniques to restore the Washington Bridge to its original or near original condition, including technical reports, repair methodologies, and industry standards referenced.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

113.All Documents and Communications between the State and/or RIDOT and AECOM concerning the selection of AECOM for inspections, design services, and the 2019 Design-Build and construction phase services for the Washington Bridge, including emails, letters, meeting minutes, and notes.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

114.All Documents and Communications related to the decision-making process by RIDOT in selecting AECOM to perform services on the Washington Bridge, including evaluation criteria, scoring sheets, and decision memorandums.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

115.All Documents and Communications evidencing the State's allegation in paragraph 210 of the Amended Complaint that AECOM "knew the representations were false or reasonably should have known the representations where false."

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

116.All Documents and Communications evidencing the State's allegation in paragraph 212 of the Amended Complaint that RIDOT relied on alleged misrepresentations by AECOM to choose AECOM to perform services on the Washington Bridge, including internal memorandums, emails, and meeting minutes.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

117.All documents and communications related to any known or suspected inaccuracies in AECOM's representations about their familiarity, competence, and repair techniques for the Washington Bridge, including internal reviews, third-party assessments, and corrective actions taken.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

118.All Documents and Communications with the Kistler Group (and/or its affiliated entities) relating to monitoring the Washington Bridge and Eastbound 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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

119.To the extent not produced in response to these Requests, all Documents and Communications You may use to support the State's claims, causes of action, allegations and defenses in this Litigation.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

120.To the extent not produced in response to these Requests, all Documents supporting, identifying and quantifying with specificity and full support/back-up, the damages the State seeks in connection with this Litigation.

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 previously produced BATES RIDOT_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

Case No.: PC-2024-04526
Page 39

Respectfully Submitted,
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By its Attorneys,

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Case No.: PC-2024-04526
Page 40

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of September 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