

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'S RESPONSE TO DEFENDANT BARLETTA/AETNA I-195
WASHINGTON BRIDGE PHASE 2 JV'S FIRST REQUEST TO PRODUCE
DATED JUNE 13, 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, Barletta/Aetna I-195 Washington Bridge North Phase 2 JV's First Request to Produce dated June 13, 2025:

1. All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's determination to issue the 2021 RFP for rehabilitation of the WASHINGTON BRIDGE instead of a demolition and replacement project.

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

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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.

2.All DOCUMENTS provided to DESIGN-BUILD PROPOSERS for the 2021 RFP.

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_000021552- RIDOT_000021841. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

3.All DOCUMENTS and COMMUNICATIONS RELATED TO the BTC and the post-tensioning system or Piers 6 and 7 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_41-83; 475-482;516-522;548-556;564-583;800-802;915-920;1012-1015;1044-1048;1074-1077;1447-1478;2483-2487;3777-3789;3785-3787;4290-4296;4325-4326;4334-4344;4384-4385;4393-4394;4399-4412;4438-4447;4452-4467;4470-4473;4510-4514;4625-4633;4637-4646;4905-4906;4926-4927;4997-5026;5035-5061;5078-5088;5093-5109;5123;5218-5219;5243-5258;5261-5263;5266-5301;5407-5408;5597;5638-5639;5791-5792;5801-5802;5807-5810;5827-5836;5841-5848;5851-5871;5874-5894;5905;5964-5967;6012-6021;6030-6031;6115-6119;6134-6135;6140;6142-6144;6164-

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6165;6168-6182;6185-6189;;6238-6247;6261-6262;6290-6295;6300-6311;6313-6315;6319-6320;6331-6335;6349-6381-6391;6396-6487;6492-6533;6553-6603;6616-6650;6663-6701;6723-6754;6758-6763;6773-6807;6824-6862;6872-6910;6919-6953;6956-6990;7002-7039;7050-7087;7099-7139;7142-7224;7236-7269;7281-7318;7329-7366;7378-7413;7425-7459;7471-7506;7518-7555;7574-7606;7621-7654;7707;9529-9530;9534-9549;9556-9573;9577-9595;9598-9600;9646-9661;9711-9712;9714-9719;9722-9740;9745-9747;9749-9777;9781-9796;9888-9892;9896-9911;9922-9931;10013-10014;10022-10029;10032-10052;10055-10075;10099;10103;10107-10116;10184-10186;10202-10205;10208-10211;10216-10218;10246-10274;10278-10336;10348-10367;10372-10374;10408-10409;10418-10422;10437;10483-10528;10700-10750;10753-10790;10801-10838;10840-10843;10846-10888;10893-10934;10943-10958;10968-10985;10989-11003;11033-11037;11042-11046;11048-11057;11059-11069;11103-11158;11199-11202;11205-11208;11212-11223;11225-11228;11255-11259;11267-11286;11819-11858;21552-21841;1677-4344;4383;4393-4394;4399-4419. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

4.All COMMUNICATIONS between or among RIDOT and any DESIGN-BUILD PROPOSERS for the PROJECT.

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_6284-6287;7954-7967;7998-8002;8459;8750;8752-8753;8756;8759;8763;8766;8785;9323-9336. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

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5.All design-build proposals submitted in response to the 2021 RFP.

RESPONSE: See previously produced BATES: 14963-15182; 15186-15308;15315-15495;15501-15706;15713-16063;16070-16706;16713-17287;17294-17725;17733-17779;17787-18082;18090-18746;18754-19148;19156-19305;19557-21384;21400-22353. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

6.All DOCUMENTS RELATED TO RIDOT's score or evaluation of design-build proposals for the PROJECT.

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.

7.All DOCUMENTS AND COMMUNICATIONS RELATED TO sources of funds available to procure the PROJECT.

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_000049853-RIDOT_000049920Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

8.A copy of RIDOT's risk matrix RELATED TO the 2021 DESIGN-BUILD CONTRACT.

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

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9.A copy of the 2021 DESIGN-BUILD CONTRACT.

RESPONSE: See previously produced BATES 21448-21551.

10.All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's review, approval, or concurrence with the JV's WASHINGTON BRIDGE rehabilitation plans, including, but not limited to, comment resolution forms, RIDOT transmittals, and certificates of compliance.

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 folder labeled Bareletta/AETNA. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

11.All meeting minutes RELATED TO the PROJECT.

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 32330-32342;32350-32499;41061-41075;41450-41464;41997-42000;42730-42733;42735-42739;42741-42745;42747-42790;42792-42795;42797-42801;42803-42807;42809-42813;42815-42819;42875-42892;42905-42959;42979-42988;43007-43011;43022-43023;43087-43066;43105-43106;43453-43454;44424-44428;42973-42977;44429-44438;44445-44446;45330-45418;45419-45449. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

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12.All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR
allegations in the AMENDED COMPLAINT ¶¶ 34-39.

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 in response to RTP 35. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

13.All DOCUMENTS and COMMUNICATIONS RELATED TO
the LICHTENSTEIN REPORT.

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 in response to RTP 35. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

14.All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR
allegations in the AMENDED COMPLAINT ¶ 91.

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

15.All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR
allegations in the AMENDED COMPLAINT ¶¶ 92-95.

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;

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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.

16.All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR allegations in the AMENDED COMPLAINT ¶¶ 103-106.

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 49738-49852. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

17.All organizational charts, procedures, instructions, or guidelines that RELATE TO the design, construction, maintenance, or assessment 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_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

18.All COMMUNICATIONS with the Federal Highway Administration RELATING TO the WASHINGTON BRIDGE after January 1, 2021.

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

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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 000000001-000014491. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

19.All COMMUNICATIONS with Wiss, Janney, Elstner Associates, Inc. RELATED TO the WASHINGTON BRIDGE after December 11, 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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

20.All COMMUNICATIONS with McNary Bergeron & Johannesen, LLC RELATED TO the WASHINGTON BRIDGE after December 11, 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. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

21.All COMMUNICATIONS between or among Peter Alviti, Jr., P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

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,

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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.

22.All COMMUNICATIONS between or among Loren Doyle and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

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.

23.All COMMUNICATIONS between or among Lori Fisette and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

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.

24.All COMMUNICATIONS between or among Robert Rocchio, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

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.

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25.All COMMUNICATIONS between or among John Preiss, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

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.

26.All COMMUNICATIONS between or among Anthony Pompei, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

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.

27.All COMMUNICATIONS between or among Dawn Cruz and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

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.

28.All COMMUNICATIONS between or among RIDOT and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after December 11, 2023

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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.

29.All work authorizations, contracts, or agreements entered into by RIDOT with any PERSON RELATED TO the design, construction, maintenance, or assessment 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_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

30.All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's determination to demolish and replace 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.

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31.All inspection and maintenance DOCUMENTS RELATED TO the WASHINGTON BRIDGE, including, but not limited to, logs, repair records, inspection reports, condition assessments, safety evaluations, compliance certificates, service records, work orders, maintenance schedules, inspection checklists, daily reports, weekly reports, monthly reports, and daily time sheets.

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 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.

32.All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's financial records or budgets for inspections 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. Subject to those objections, and without waiving the same, see previously produced BATES 1860;3574-3595;4279;6001-6003;6152-6157;7728-7729;7731-7770;7785-7786;7906-7907;7918-7949;7951-7952;8746-8747;8795-8796;8860-8875;8883-8884;8897-8914;8957-8958;8971-9020;11042-11057;11342-11363;11364-11514;11750-11753;12861-12864;14496-14497;14660;14726;14754-14757. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

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33.All DOCUMENTS and COMMUNICATIONS RELATED TO the inspection costs of the WASHINGTON BRIDGE incurred by RIDOT after December 11, 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. Subject to those objections, and without waiving the same, see previously produced BATES 32276-33006. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

34.All photographs or videos 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_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

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

/s/ Stephen N. Provazza

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CERTIFICATE OF SERVICE

I hereby certify that on the 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.

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