

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

**NOTICE OF SERVING RESPONSES TO DEFENDANT BARLETTA/AETNA I-195
WASHINGTON BRIDGE NORTH PHASE 2 JV, FIRST SET OF INTERROGATORIES
DATED JUNE 13, 2025.**

Pursuant to Rule 26 and 33 of the Superior Court Rules of Civil Procedure, now comes the Plaintiff, the State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following responses to Defendant Barletta/AETNA I-195 Washington Bridge North Phase 2 JV's First Set of Interrogatories dated June 13, 2025.

1. Identify the total cost of RIDOT's POST-CLOSURE investigation of the WASHINGTON BRIDGE, which resulted in RIDOT's decision to demolish and rebuild the WASHINGTON BRIDGE. Please itemize the costs by category or PERSON, including a description of the services provided and the respective cost amounts.

RESPONSE:

RIDOT incurred the following costs:

Bridge Inspection	\$1,887,055.78
Emergency Contract 2024-CB-012:	\$19,027,822.60
AECOMM	\$153,615.27
Total:	\$21,068,493.65

All costs subject to change, including but not limited to review by the State's experts.

See BATES RIDOT_000049853-RIDOT_000049920, produced contemporaneously with this response.

2. Identify RIDOT's budget(s) for inspection of the WASHINGTON BRIDGE between January 1, 2000 to December 11, 2023.

RESPONSE: There is no specific line item in RIDOT's budget from 2000 to 2023 for bridge inspections for the Washington Bridge.

3. Identify the individuals who set the inspection budget(s) for the WASHINGTON BRIDGE between January 1, 2000 to December 11, 2023.

RESPONSE: See Response and Production provided for in Interrogatory 2.

4. Identify each PERSON engaged by RIDOT to conduct inspections of the WASHINGTON BRIDGE between January 1, 2000 through the present date. Please itemize, by year and the PERSON(S) engaged by RIDOT, including their roles and the services they provided.

RESPONSE: See BATES RIDOT_000050806, produced contemporaneously with this response.

5. Explain what analysis RIDOT performed to determine the scope of work required for each inspection of the WASHINGTON BRIDGE.

RESPONSE: All bridges subject to the National Bridge Inspection Standards (NBIS) are inspected per the FHWA Bridge Inspection Reference Manual (BIRM) and the RI Bridge Inspection Manual. The scope of work for any bridge inspection is contained within these documents.

6. Identify all dates radiographic, ultrasonic shear wave tomography ("MIRA"), or ground penetrating radar ("GPR") testing was performed on the WASHINGTON BRIDGE, and on what components the testing was performed.

RESPONSE: Past evaluation and testing on the Washington Bridge 700 included the following:

In 1992, Lichtenstein was contracted to perform an emergency inspection, testing and evaluation of the cantilever beams and ship lap joints. Testing done included radiography, concrete compressive strength and chloride ion testing. The report has been provided.

In 1993/1994, testing was performed as part of the development for the 1996 rehabilitation contract. Testing performed included GPR (Ground Penetrating Radar), concrete testing for compressive strength, chloride ion, ph and half-cell; and Post Tensioning inspection and testing. The results and testing reports have been provided.

In 1996-1997, Impact Echo Testing was conducted by WDP for the 1996 rehabilitation contract. The results of the testing have been provided.

In 2014/2015, testing was performed as part of development for the 2016 construction contract. Testing performed and included in this report included testing of concrete cores for compressive strength and presence of chlorides; petrographic analysis of the concrete cores for concrete quality; lead testing of Span 7; and non-destructive GPR (Ground Penetrating Radar) testing of the concrete bridge deck. The results and testing reports have been provided.

In 2021, an Aerial infrared thermography (aerial IR) survey was carried out to evaluate the condition of the bridge deck. The report has been provided.

In late 2023-early 2024 after the bridge closure, BDI provided nondestructive testing and evaluation of the post-tension girders utilizing ground penetrating radar (GPR), ultrasonic tomography (MIRA), selected coring, and physical / chemical testing for the investigation. The testing was intended to determine the grout condition of the post-tension ducts, condition of the surrounding structural concrete, and to locate areas of potential for deterioration. BDI, also provided real time vibration monitoring services for displacement during the non-destructive testing and repairs of Bridge 700. The BDI Nondestructive Evaluation of Post-Tensioned Ducts and Structural Concrete report, dated February 21, 2024, have been provided.

7. In reference to AMENDED COMPLAINT, ¶ 91, identify whether the BTC addressed the existence of problems relating to the tie-down rods at Piers 6 and 7 and called for repairs to the post-tensioning systems of the WASHINGTON BRIDGE. If so, please identify the specific BTC plan sheet number(s) and describe in detail the work the BTC required the JV to perform on the tie-down rods at Piers 6 and 7 and the WASHINGTON BRIDGE'S post-tensioning systems.

RESPONSE: In RFP Part 2, Section 3.13.7.1 Washington Bridge Rehabilitation, "The overall goal of this project is to provide a 25-year design life for the rehabilitated structure; therefore, the DB Entity shall design and construct the bridge strengthening and rehabilitation with a minimum design life of 25 years." The same section also goes on to state "The Design Build Team is responsible for any required retrofit or strengthening required by their proposal to achieve the 25-year design life. The DB Entity shall develop models and prepare design calculations as necessary to show their proposed method or rehabilitation will achieve this requirement."

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

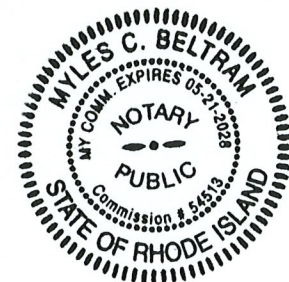
By: Loren Doyle
Loren Doyle

Dated: 9/2/2025

STATE OF RHODE ISLAND
COUNTY OF PROVIDENCE

On this 2nd day of September, 2025, before me, the undersigned notary, personally appeared Loren Doyle personally known to the notary, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his knowledge.

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



As to Objections,
Respectfully Submitted,
Plaintiff,
State of Rhode Island,
By its Attorneys,

/s/ Stephen N. Provazza

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

/s/ Theodore J. Leopold

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

/s/ Jonathan N. Savage

Jonathan N. Savage, Esq. (#3081)
Michael P. Robinson, Esq. (#6306)
Edward D. Pare III, Esq. (#9698)
Savage Law Partners, LLP
564 South Water Street
Providence, RI 02903
Tel: (401) 238-8500

Fax: (401) 648-6748
js@savagelawpartners.com
mrobinson@savagelawpartners.com
epare@savagelawpartners.com

CERTIFICATE OF SERVICE

I hereby certify that on the 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