

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 NORTH PHASE 2 JV'S SECOND REQUEST TO PRODUCE
DATED JUNE 20, 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 Second Request to Produce dated June 20, 2025:

35. All COMMUNICATIONS between or among RIDOT and LICHTENSTEIN RELATED TO radiographic, ultrasonic shear wave tomography, or ground penetrating radar testing 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_000012781-000012839; 000014963-RIDOT_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

36. All DOCUMENTS RELATED TO RIDOT's solicitation of BID # 7461338.

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_000014963- RIDOT_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

37. All DOCUMENTS RELATED TO RIDOT's evaluation of the proposals in response to the BID # 7461338 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_000014963- RIDOT_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

38. All Letters of Interest / Technical Proposals (LOI/TECH) in response to BID

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_000014963-RIDOT_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

39. All DOCUMENTS RELATED TO the TECHNICAL SELECTION CRITERIA for BID # 7461338.

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_000014963- RIDOT_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

40. All DOCUMENTS RELATED TO the TEC's "Final Selection" recommendation for BID # 7461338.

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_000014963- RIDOT_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

41. All DOCUMENTS and COMMUNICATIONS between or among the TEC RELATING TO BID # 7461338.

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_000014963- RIDOT_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

42. All COMMUNICATIONS between or among the TEC and respective proposers for BID # 7461338.

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_000014963- RIDOT_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

43. A copy of the National Bridge Inspection Standards ("NBIS"), inspection report, for the WASHINGTON BRIDGE, from NBIS's inspection performed on or about August 3, 2011.

RESPONSE: See BATES RIDOT_000049921-RIDOT_000050804 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

44. A copy of Michael Baker International, Inc.'s Bridge Load Rating report for the WASHINGTON BRIDGE, dated July 10, 2012, and revised September 13, 2012.

RESPONSE: See BATES See BATES RIDOT_000049921-RIDOT_000050804 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

45. A copy of Michael Baker International, Inc.'s Bridge Load Rating report for the WASHINGTON BRIDGE, dated July 10, 2012, as revised August 10, 2012, and September 13, 2012.

RESPONSE: See BATES See BATES RIDOT_000049921-RIDOT_000050804 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

46. All DOCUMENTS RELATING TO RIDOT's condition assessment of the WASHINGTON BRIDGE, which led to or contributed to RIDOT's decision to rehabilitate the bridge through issuance of 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_000000001- RIDOT_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

47. All internal DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's decision to rehabilitate the WASHINGTON BRIDGE, including risk assessments, engineering evaluations, and cost-benefit analyses.

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.

48. All internal DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's decision to demolish the WASHINGTON BRIDGE, including risk assessments, engineering evaluations, and cost-benefit analyses.

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.

49. All internal DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's decision to rebuild the WASHINGTON BRIDGE, including risk assessments, engineering evaluations, and cost-benefit analyses.

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.

50. All reports prepared or for the STATE, RIDOT, or any agency of the STATE, whether in draft or final form and all appendices thereto, RELATED TO the WASHINGTON BRIDGE, including, without limitations, any 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. 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.

51. All DOCUMENTS and COMMUNICATIONS in your possession, custody, or control RELATING TO WJE and 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.

52. All DOCUMENTS and COMMUNICATIONS RELATIONG TO the STATE and/or RIDOT's plan 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 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.

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.

/s/ Edward D. Pare III