

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 RESPONSE TO DEFENDANT
BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV'S
REQUEST FOR ADMISSIONS DATED 6/13/2025**

Pursuant to Rule 36 of the Superior Court Rules of Civil Procedure, now comes the Plaintiff, State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following Response to Defendant, Barletta/Aetna I-195 Washington Bridge North Phase 2 JV's Request for Admissions dated June 13, 2025:

1. Admit that the LICHTENSTEIN REPORT recommended RIDOT perform radiographic and other testing of the WASHINGTON BRIDGE before any attempts to rehabilitate the bridge.

RESPONSE: DENIED.

2. Admit that RIDOT did not provide radiographic, ultrasonic shear wave tomography ("MIRA"), or ground penetrating radar ("GPR") test results of the post-tensioning system of the WASHINGTON BRIDGE in the 2021 RFP.

RESPONSE: ADMITTED IN PART. The Plaintiff further responds that any relevant information, including tests performed, was available to all proposers upon request. See 2021 RFP wherein it provides, "proposers shall be responsible for...informing themselves about any conditions that may affect...its performance of contract obligations."

3. Admit that the 2021 RFP did not provide DESIGN-BUILD PROPOSERS the LICHTENSTEIN REPORT.

RESPONSE: ADMITTED IN PART. The Plaintiff further responds that any relevant information, including any prior reports, was available to all proposers upon request. See 2021 RFP wherein it provides, "proposers shall be responsible for...informing themselves about any conditions that may affect...its performance of contract obligations."

4. Admit that RIDOT did not disclose the LICHTENSTEIN REPORT to the DESIGN-BUILD PROPOSERS:

RESPONSE: ADMITTED IN PART. The Plaintiff further responds that any relevant information, including any prior reports, was available to all proposers upon request. See 2021 RFP wherein it provides, "proposers shall be responsible for...informing themselves about any conditions that may affect...its performance of contract obligations."

5. Admit that the 2021 RFP required rehabilitation of the WASHINGTON BRIDGE.

RESPONSE: DENIED.

6. Admit that the 2021 RFP did not require the WASHINGTON BRIDGE to be demolished and rebuilt.

RESPONSE: DENIED.

7. Admit that before issuing the 2021 RFP, RIDOT determined the WASHINGTON BRIDGE could be rehabilitated.

RESPONSE: ADMITTED that RIDOT hired AECOM to create the 2021 RFP which required AECOM to provide analysis of the then condition of the Washington Bridge. Otherwise DENIED.

8. Admit that the 2021 RFP did not require DESIGN-BUILD PROPOSERS to evaluate whether the WASHINGTON BRIDGE could be rehabilitated.

RESPONSE: DENIED.

9. Admit that RIDOT did not request that DESIGN-BUILD PROPOSERS design a replacement for the WASHINGTON BRIDGE.

RESPONSE: ADMITTED.

10. Admit that the 2021 RFP provided the BTC to the DESIGN-BUILD PROPOSERS.

RESPONSE: ADMITTED.

11. Admit that the BTC defined the scope of the PROJECT.

RESPONSE: PARTIALLY ADMITTED. Major features of the BTC were provided to proposers. Otherwise DENIED.

12. Admit that proposals in response to the 2021 RFP were to be based on the BTC.

RESPONSE: PARTIALLY ADMITTED. While proposals in response to the 2021 RTP were to be based on the BTC, proposers, however, were permitted to submit Alternate Technical Concepts. Otherwise DENIED.

13. Admit that the BTC could not extend the life expectancy of the WASHINGTON BRIDGE by at least 25 years based upon the results of the POST-CLOSURE testing.

RESPONSE: DENIED.

14. Admit that the 2021 DESIGN-BUILD CONTRACT required the JV to advance the BTC.

RESPONSE: Objection. This request is vague and ambiguous because it does not define “advance the BTC” and therefore mischaracterizes the requirements of the 2021 Design-Build Contract.

15. Admit that the BTC did not identify any structural deficiencies with the tie-down rods or prestressed concrete beams at Piers 6 and 7 of the WASHINGTON BRIDGE.

RESPONSE: ADMITTED, however, good engineering practice would include a thorough assessment of the bridge, its original design, all subsequent reports, inspections, and any recommendations for repair prior to undertaking performance of any contractual obligations related to repairs, replacement or demolition of the bridge.

16. Admit that the BTC did not identify any structural deficiencies with the post- tensioning system of the WASHINGTON BRIDGE.

RESPONSE: ADMITTED, however good engineering practice would include a thorough assessment of the bridge, its original design, all subsequent reports, inspections and any recommendations for repair prior to undertaking performance of any contractual obligations related to repairs, replacement or demolition of the bridge.

17. Admit that the BTC did not require any retrofit or remediation of the tie-down rods at Piers 6 or 7 or the post-tensioning system of the WASHINGTON BRIDGE.

RESPONSE: ADMITTED, however good engineering practice would dictate visual examination that would have revealed the necessities of a retrofit, BTC system.

18. Admit that the POST-CLOSURE testing revealed that successful rehabilitation of the WASHINGTON BRIDGE could not be achieved.

RESPONSE: Objection. Vague and Ambiguous. Without Waiving said objections, ADMITTED that the VN Assessment of the Type-D Cantilever Beam Post-Tensioning System on the I-195 Westbound Washington Bridge revealed that, as of February 26, 2024, “The repairs and strengthening required to address the documented deterioration and deficiencies along the structure are significant, have limited viability, and have risks associated with them. To fully eliminate these risks and improve inspection, maintenance, and repair access would require the demolition and replacement of the superstructure, and potentially a

full bridge replacement.” Otherwise DENIED.

19. Admit that the POST-CLOSURE testing revealed structural deficiencies that could not be viably repaired.

RESPONSE: Objection. Vague and Ambiguous. Without Waiving said objections, ADMITTED that the VN Assessment of the Type-D Cantilever Beam Post-Tensioning System on the I-195 Westbound Washington Bridge revealed that, as of February 26, 2024, “The repairs and strengthening required to address the documented deterioration and deficiencies along the structure are significant, have limited viability, and have risks associated with them. To fully eliminate these risks and improve inspection, maintenance, and repair access would require the demolition and replacement of the superstructure, and potentially a full bridge replacement.” Otherwise DENIED.

20. Admit that, between January 1, 2013, and December 11, 2023, RIDOT did not assess through GPR or other radiographic testing whether the WASHINGTON BRIDGE could be viably rehabilitated.

RESPONSE: ADMITTED. The reliance on GPR or further testing would have been the result of the contractors indicating such testing was needed.

21. Admit that, after December 11, 2023, RIDOT assessed whether the WASHINGTON BRIDGE could be viably rehabilitated.

RESPONSE: Objection. Vague and Ambiguous. Without Waiving said objections, ADMITTED that the VN Assessment of the Type-D Cantilever Beam Post-Tensioning System on the I-195 Westbound Washington Bridge revealed, that as of February 26, 2024, “The repairs and strengthening required to address the documented deterioration and deficiencies along the structure are significant, have limited viability, and have risks associated with them. To fully eliminate these risks and improve inspection, maintenance, and repair access would require the demolition and replacement of the superstructure, and potentially a full bridge replacement.” Otherwise DENIED.

22. Admit that RIDOT performed GPR, MIRA, and other testing of the WASHINGTON BRIDGE after December 11, 2023.

RESPONSE: ADMITTED that RIDOT consultants performed GPR, MIRA, and other testing of the Washington Bridge after December 11, 2013.

23. Admit that RIDOT stated, “[t]he failing components called anchor rods were identified by RIDOT consultants during an inspection of the ongoing work but in an area that was not part of the reconstruction project”, REGARDING the WASHINGTON BRIDGE.

RESPONSE: Objection. The responding party cannot admit or deny this request as phrased because it is unclear what specific statement, speaker, or context is being referenced.

24. Admit that the “reconstruction project” referenced in Request for Admission No. 23 refers to the PROJECT.

RESPONSE: Objection, vague and ambiguous. The responding party cannot admit or deny this request as phrased because it is unclear what specific statement, speaker, or context is being referenced.

25. Admit that RIDOT determined to demolish and replace the WASHINGTON BRIDGE based upon the results of the GPR, MIRA, and other testing performed after December 11, 2023.

RESPONSE: DENIED

26. Admit that RIDOT could have performed the POST-CLOSURE testing protocol before issuance of the 2021 RFP.

RESPONSE: DENIED. The RFP process required the consultants to perform (i.e. AECOM) any required testing to generate the RFP. Also, the RFP required the Design Build team to do any independent analysis to advance the BTC to a minimum 25-year design life, which may have included, but was not limited to the type of post-closure testing that was performed.

27. Admit that the “the weight limit for trucks on the [WASHINGTON BRIDGE NO. 200] is 80,000 pounds.”

RESPONSE: DENIED.

28. Admit that RIDOT has “structural concerns” REGARDING vehicles or trucks exceeding 96,000 pounds that traverse the WASHINGTON BRIDGE NO. 200.

RESPONSE: DENIED.

29. Admit that 123 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between January 15, 2025 to January 18, 2025.

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RESPONSE: DENIED.

30. Admit that 461 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between January 19, 2025 to January 25, 2025.

RESPONSE: DENIED.

31. Admit that 301 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between January 26, 2025 to February 1, 2025.

RESPONSE: DENIED.

32. Admit that 600 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between February 2, 2025 to February 8, 2025.

RESPONSE: DENIED.

33. Admit that 517 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between February 9, 2025 to February 15, 2025.

RESPONSE: DENIED.

34. Admit that 332 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between February 16, 2025 to February 22, 2025.

RESPONSE: DENIED.

35. Admit that 287 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between February 23, 2025 to March 1, 2025.

RESPONSE: DENIED.

36. Admit that 366 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between March 2, 2025 to March 8, 2025.

RESPONSE: DENIED.

37. Admit that 207 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between March 9, 2025 to March 15, 2025.

RESPONSE: DENIED.

38. Admit that 375 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between March 16, 2025 to March 22, 2025.

RESPONSE: DENIED.

39. Admit that 522 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between March 23, 2025 to March 29, 2025.

RESPONSE: DENIED.

40. Admit that 365 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between March 30, 2025, to April 5, 2025.

RESPONSE: DENIED.

41. Admit that 600 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between April 6, 2025 to April 12, 2025.

RESPONSE: DENIED.

42. Admit that 683 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between April 13, 2025 to April 19, 2025.

RESPONSE: DENIED.

43. Admit that 446 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between April 20, 2025 to April 26, 2025/

RESPONSE: DENIED.

44. Admit that 324 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between April 27, 2025 to May 3, 2025.

RESPONSE: DENIED.

45. Admit that 471 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between May 4, 2025 to May 10, 2025.

RESPONSE: DENIED.

46. Admit that 457 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between May 11, 2025 to May 17, 2025.

RESPONSE: DENIED.

47. Admit that 525 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between May 18, 2025, to May 24, 2025.

RESPONSE: DENIED.

48. Admit that 573 vehicles over 96,000 lbs. traversed over the WASHINGTON BRIDGE NO. 200 between May 25, 2025, to May 31, 2025.

RESPONSE: DENIED.

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.

/s/ Edward D. Pare III