

STATE OF RHODE ISLAND  
PROVIDENCE, S.C.

SUPERIOR COURT  
CIVIL ACTION NO. PC-2024-04526

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.

**DEFENDANT COMMONWEALTH ENGINEERS & CONSULTANTS, INC.'S FIRST  
SET OF INTERROGATORIES TO PLAINTIFF STATE OF RHODE ISLAND**

Pursuant to Rule 33 of the Rhode Island Superior Court Rules of Civil Procedure, the defendant, Commonwealth Engineers & Consultants, Inc. ("CEC"), by its undersigned counsel, hereby propounds the following interrogatories to be answered by the plaintiff, State of Rhode Island ("Plaintiff" or "State"), within forty (40) days hereof.

**INSTRUCTIONS**

1. This first set of interrogatories shall be deemed continuing and you shall supplement your responses in accordance with the Rhode Island Superior Court Rules of Civil Procedure.

2. Answers to these interrogatories must include information known to the State. If the person or persons answering these interrogatories does not have enough information to answer any of the interrogatories, it is his or her duty to make a reasonable effort to obtain such information.

3. If you object to answering any interrogatory, please state the precise grounds for each objection and the basis for asserting that such grounds are applicable. If you contend that a portion of an interrogatory is objectionable, please explain the reasons for the objection and answer that portion that you do not contend is objectionable.

4. If an interrogatory is objected to on the ground of attorney-client privilege or on the ground of attorney-work product or that the information requested was obtained to prepare in anticipation of litigation or for trial, sufficient information must be provided (i) to permit the subject matter, but not content, of the allegedly privileged information to be identified with sufficient specificity to allow a party to determine whether a motion to compel is warranted; and (ii) to explain the basis for the claim of privilege in order that a court can properly determine its propriety.

### **DEFINITIONS**

1. The term “CEC” refers to Commonwealth Engineers & Consultants, Inc. and any of its present or former employees, servants, attorneys, agents, consultants, and other representatives or persons acting on its behalf or under its control.

2. The terms “State”, “State of Rhode Island”, “You”, and “Your” refer to the State of Rhode Island, and its present or former employees, servants, attorneys, agents, consultants, and other representatives or persons acting on its behalf or under its control.

3. “Amended Complaint” refers to the Amended Complaint filed by The State of Rhode Island on April 15, 2025, in the above-captioned lawsuit in the State of Rhode Island, Providence County Superior Court, docketed as *The State of Rhode Island v. AECOM Technical Services, Inc. et al*, Case No. PC-2024-04526.

4. “Westbound Washington Bridge” means the Interstate I-95 westbound bridge structure over the Seekonk River connecting Providence, Rhode Island and East Providence, Rhode Island.

5. “Eastbound Washington Bridge” means the Interstate I-95 eastbound bridge structure over the Seekonk River connecting Providence, Rhode Island and East Providence, Rhode Island.

6. “Identify” means, when referring to a person, to give, to the extent known, the person’s full name, present or last known address, and, when referring to a natural person, the present or last known place of employment.

7. “Identify” means, when referring to documents, to give, to the extent known, the type of document, general subject matter, date of the document, author(s), addressee(s), recipient(s) and present location of such document.

8. “Document” means, without limitation, any written, printed, typed, photographed, recorded or otherwise reproduced or stored communication or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, or any combination thereof. This definition includes copies or duplicates of documents contemporaneously or subsequently created which have any non-conforming notes or other markings and the backsides of any communication or representation which all contain any of the above.

9. Capitalized terms not defined herein have the meanings given to them in the Amended Complaint.

## **INTERROGATORIES**

### **INTERROGATORY NO. 1**

Please state the basis for your claim in Paragraph 120 of the Amended Complaint that CEC assisted AECOM in conducting the July 24, 2019 inspection of the Westbound Washington Bridge, including in your response:

- (a) all facts that support or form the foundation for the claim; and
- (b) sufficient information to Identify any documents that support or form the foundation for the claim.

### **INTERROGATORY NO. 2**

Please state the basis for your claim in Paragraph 120 of the Amended Complaint that CEC assisted AECOM in conducting the July 21, 2023 inspection of the Westbound Washington Bridge, including in your response:

- (a) all facts that support or form the foundation for the claim; and
- (b) sufficient information to Identify any documents that support or form the foundation for the claim.

### **INTERROGATORY NO. 3**

Do You claim that CEC owed the State a duty with regards to inspection(s) of the Westbound Washington Bridge? If Your answer is anything other than an unqualified “no,” please state the basis for Your claim, including in your response:

- (a) all facts that support or form the foundation for the claim; and
- (b) sufficient information to Identify any documents that support or form the foundation for the claim.

### **INTERROGATORY NO. 4**

Please Identify any contract or agreement that You claim obligated CEC to inspect the Westbound Washington Bridge at any time.

### **INTERROGATORY NO. 5**

Please describe the State’s understanding of CEC’s obligations, involvement, and work performed with regard to the rehabilitation design project (RIDOT RFP/Bid No. 7461338), including in Your response:

- (a) all facts that support or form the foundation for the State's understanding; and
- (b) sufficient information to Identify any documents that support or form the foundation for the State's understanding.

#### **INTERROGATORY NO. 6**

Please itemize all damages the State claims to have suffered related to "increased traffic volume" and "wear and tear" on the Eastbound Washington Bridge as alleged in Paragraphs 101-106 of the Amended Complaint, including the following in your answer:

- a. a description of the claimed damages;
- b. the dollar amount of each claimed damage;
- c. the method in which such damages were calculated; and
- d. an explanation of how each element of Your damage was calculated.

#### **INTERROGATORY NO. 7**

Please Identify all expert witnesses the State plans to call at the trial of this matter connection with the State's claims against CEC including but not limited to the following:

- a. the name and address of each witness expected to testify;
- b. the subject matters in which each expert witness is expected to testify;
- c. the substance of the facts and opinions to which each expert is expected to testify;
- d. a summary of the grounds of each opinion.

#### **INTERROGATORY NO. 8**

Please Identify by name, address, telephone number, email address, and current occupation, each person You intend to call as a witness at the trial of this matter who You expect will testify in any way relating to the State's claims against CEC.

#### **INTERROGATORY NO. 9**

Please Identify all documents and things You intend to introduce into evidence at the trial of this matter which relate in any way to the State's claims against CEC.

THE DEFENDANT,  
COMMONWEALTH ENGINEERS  
& CONSULTANTS, INC.,

By its Attorneys,



Susan M. Silva, Esq., R.I. Bar #9505  
Timothy O. Egan, Esq., R.I. Bar #9239  
Peabody & Arnold LLP  
Federal Reserve Plaza  
600 Atlantic Avenue  
Boston, MA 02210-2261  
(617) 951-2063  
*ssilva@peabodyarnold.com*  
*tegan@peabodyarnold.com*

With an office at:

40 Westminster Street  
Providence, RI 02903

**CERTIFICATE OF SERVICE**

I, Susan M. Silva, hereby certify this 16<sup>th</sup> of September, 2025, that the foregoing document  
was electronically served electronically upon all parties on record.



Susan M. Silva, Esq.

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