

STATE OF RHODE ISLAND
PROVIDENCE, SC.

MPD:rad 24-180
SUPERIOR COURT

STATE OF RHODE ISLAND

VS.

C.A. No: PC-2024-04526

AECOM TECHNICAL SERVICES, INC.,
AETNA BRIDGE COMPANY,
ARIES SUPPORT SERVICES, INC.,
BARLETTA HEAVY DIVISION, INC.,
BARLETTA/AETNA 1-195 WASHINGTON
BRIDGE NORTH PHASE 2JV,
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.

**DEFENDANT TRANSYSTEMS CORPORATION'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Pursuant to Rule 34 of the Rhode Island Rules of Civil Procedure the defendant, TRANSYSTEMS CORPORATION ("TranSystems" or "Defendant"), by its undersigned counsel, hereby requests that the Plaintiff, STATE OF RHODE ISLAND ("State" or "Plaintiff"), produce for inspection and copying true copies of documents requested herein to defendant's counsel, Rice Dolan & Kershaw, 72 Pine Street, Suite 300, Providence, RI 02903, or in such other format, place or manner as may be agreed upon by TranSystems and the State or ordered by the Court by all applicable Rules and Definitions and Instructions set forth below within forty (40) days of service.

DEFINITIONS AND INSTRUCTIONS

(1) As used herein, the term "document" is used in the broad sense and includes, but is not limited to, the following items, whether printed or recorded or reproduced by any other mechanical process, or written or produced by hand, and whether sent or received or neither, namely; agreements; communications, including intra-company communications; memos;

statements; notes; correspondence; telegrams; memoranda; notices; records; books; summaries or records of telephone conversations; summaries or records of personal conversations or interviews; diaries; forecasts; statistical statements; accounts' work papers; graphs; charts; ledgers; journals; books or records of account; summaries of accounts; balance sheets; income statements; minutes or records of meetings or conferences; desk calendars; appointment books (including pocket appointment books); reports and/or summaries of interviews; reports and/or summaries of investigations; rough or scratch pad notes; records; reports or summaries of negotiations; studies; brochures; pamphlets; circulars; press releases; contracts; projections; drafts of any documents; working papers; marginal notations; photographs; drawings; checks (front and back); tape or video recordings; computer printouts; data processing input and output; microfilms; check stubs or receipts; and any other document or writing or whatever description.

As used herein, "document" means the original and any non-identical copy. Handwritten notations of any kind on the original or any copy of a document render same non-identical.

(2) The term "communication" means all oral conversations, discussions, letters, telegrams, memoranda, meetings, conferences, discussions, notes, internal memoranda, email, voicemail, facsimile, and any transmission of information in any form, both oral and written.

(3) The term "Plaintiff", or "State", or "you" or "your" shall mean the Plaintiff, State of Rhode Island and/or its agents and all other persons acting on its behalf.

(4) The term "RIDOT" means the Rhode Island Department of Transportation and includes departments, segments, divisions, subdivisions, administrative entities and bodies, and other related entities, both presently existing and those which previously existed of any of the foregoing entities, and any present or former officers, directors, employees, consultants, contractors, attorneys, and agents of the foregoing entity.

(5) The term "Defendant" or "TranSystems" refers to the defendant TranSystems Corporation.

(6) The term "Complaint" or "Amended Complaint" refers to the Amended Complaint filed by The State of Rhode Island on April 15, 2025, in the above-captioned lawsuit pending in the State of Rhode Island, Providence County Superior Court, docketed as C.A. No: PC-2024-04526.

(7) The term “Bridge” or “Washington Bridge” means the Interstate I-195 westbound Washington Bridge in Rhode Island, formally known as the Washington Bridge North No. 700, which was constructed in 1967 and opened to traffic in 1968.

(8) The term “Eastbound Washington Bridge” means the Interstate I-195 eastbound portion bridge structure over the Seekonk River connecting Providence, Rhode Island and East Providence, Rhode Island.

(9) These document requests are to be deemed continuing so as to require supplemental production if Plaintiff obtains or discovers further documents responsive to these requests after production has been made. Such supplemental production shall be made upon notice to Defendant’s attorneys within thirty (30) days after such further documents come into Plaintiff’s custody, possession or control or are discovered by Plaintiff, but in no event later than ten (10) days before the date set for trial or dispositive hearing.

(10) Plaintiff is to produce all documents in its possession, custody or control, including documents as to which the Defendants have the right to request actual possession.

(11) Each document produced in compliance with this request should be accompanied by an indication as to the particular paragraph(s) under which it is being introduced.

(12) If Plaintiff claims privilege for any document requested herein, provide the following information as to each such document:

- (a) the title, heading or caption of such document, if any;
- (b) the identifying number(s), letter(s), or combination thereof, if any, and the significance or meaning of such number(s), letter(s) or combination thereof;
- (c) the date appearing on such document and if no date appears thereon, the approximate date on which such document was prepared;
- (d) the general nature or description of such document (i.e., whether it is a letter, memorandum, minutes of meeting, etc.) and the number of pages of which it consists;
- (e) the name of the person who signed such document or, if it was not signed, the name of the person or persons who prepared it;

- (f) the name(s) of the person(s) to whom such document was addressed and the name of each person, other than the addressee(s), to whom such document, or a copy thereof, was sent;
- (g) the identity of the person who has custody of such document; and
- (h) a general summary of the substance of the document.

REQUESTS

1. All agreements entered into between the State and any other party or third party relating to inspections or evaluations of the Washington Bridge during the time period of January 1, 1990 to present.
2. All documents and communications relating to or identifying deficiencies in the inspection performed by TranSystems of the Washington Bridge in 2016.
3. All documents and communications relating to or identifying deficiencies in the inspection performed by TranSystems of the Washington Bridge in 2022.
4. All documents and communications relating to the State's allegation in Paragraph 69 of the Complaint that "none of the firms that conducted the inspections adequately recognized or addressed critical elements of the bridge's structural safety and integrity."
5. All documents and communications concerning the allegations in Paragraph 139 of the Amended Complaint that TranSystems breached its inspection contracts by failing to (a) conduct a detailed research and review of the bridge structure file for the Washington Bridge, including but not limited to, previous inspection reports, drawings, and plans; (b) conduct an inspection of the Washington Bridge in conformance with the inspection contracts; (c) perform evaluations and report to the State as required by the contracts; (d) recommend needed repairs in accordance with the requirements of the contracts; and (e) otherwise comply with its contractual obligations.
6. All documents and communications concerning the allegations in Paragraph 143 of the Amended Complaint that TranSystems specifically and negligently failed to (a) conduct a detailed research and review of the bridge structure file for the Washington Bridge, including but not limited to, previous inspection reports, drawings, and plans; (b) conduct an inspection of the Washington Bridge in conformance with the standard of care customary in the professional engineering, consulting, construction, and design industry; (c) recognize the importance and significance of the tie-down rods as critical to the stability of the Washington Bridge; (d) perform an investigation into or evaluation of the cracking discovered along the post-tension cables in the post-tensioned cantilever beams; and (e) recommend repairs to address the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams.

7. All documents and communications concerning the allegations in Paragraph 144 of the Amended Complaint that as a direct and proximate result of TranSystems negligence, the State has suffered and will continue to suffer both physical damages to its property and economic damages.
8. All documents and communications relating to the investigation, evaluation, rehabilitation, design or closure of the Washington Bridge from December 11, 2023 to the present.
9. All documents and communications relating to the State's and RIDOT's efforts to preserve the allegedly damaged elements of the Washington Bridge before the alleged discovery of the damaged tie-rods on or about December 8, 2023.
10. All documents and communications relating to any notification to the State and/or RIDOT that the Washington Bridge's sub-structure (i.e., piers and abutments) were in poor condition prior to the alleged discovery of the damaged tie-rods on or about December 8, 2023.
11. All documents and communications relating to any notification to the State and/or RIDOT that the Washington Bridge's superstructure (i.e., girders/beams and tie-down rods) were in poor condition prior to the alleged discovery of the damaged tie-rods on or about December 8, 2023.
12. All documents and communications relating to the State's and RIDOT's efforts to preserve the allegedly damaged elements of the Washington Bridge after the alleged discovery of the damaged tie-rods on or about December 8, 2023.

/s/ Mark P. Dolan

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CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2025, I *served* this document through the electronic filing system to the following parties:

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/s/ Mark P. Dolan