

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 SET OF INTERROGATORIES TO PLAINTIFF
STATE OF RHODE ISLAND

Pursuant to Rule 33 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”) answer under oath each of the following Interrogatories set forth below within forty (40) days of service.

INSTRUCTIONS

- (1) The State shall answer each question separately and fully in writing and under oath.
- (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) These interrogatories require supplemental or amended answers to the extent required by Rule 33 of the Rhode Island Rules of Civil Procedure.

When an objection is made to any interrogatory or subpart thereof, it shall state with specificity all grounds upon which the objecting party relies. 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 “Defendant” or “TranSystems” refers to the defendant TranSystems Corporation.

(2) “And” shall include “or” and vice versa; the singular shall include the plural and vice versa; “any” includes the word “all” and “all includes the word “any”; “each” includes the word “every” and “every includes the word “each.”

(3) 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.

(4) “Communication(s)” means the transmittal of information (in the form of facts, idea, inquires or otherwise).

(5) “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.

(6) 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.

(7) 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.

(8) “Include” or “including” means including but not limited to.

(9) The term “Interrogatories” refers to the below Interrogatories.

(10) “Litigation” means 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*, C.A. No: PC-2024-04526.

(11) “RIDOT” means Rhode Island Department of Transportation and includes any departments, segments, divisions, 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.

(12) The terms “referring to”, “relating to”, or “concerning” shall be broadly construed to mean referring to, describing, or constituting.

(13) The terms the “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.

INTERROGATORIES

1. With respect to the State’s 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*”, state and identify with specificity:
 - a. each contract provision that the State contends TranSystems breached;
 - b. how TranSystems allegedly failed to comply with, or breach, each such contract provision;
 - c. the specific inspection reports, drawings, and plans that the State contends TranSystems failed to review;
 - d. all facts, acts, or omissions constituting the alleged breach;
 - e. how these alleged acts or omissions caused or contributed to the State’s alleged damages; and

- f. all Documents and Communications that support, relate to, or refute such allegations.
2. With respect to the State's allegations in Paragraph 143 of the Amended Complaint that TranSystems "*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...*", state and identify with specificity:
 - a. the specific reports, drawings, and plans that the State contends TranSystems failed to review;
 - b. the duty of care that was allegedly breached and the source of such duty;
 - c. the basis for the State's assertions or allegations that such review was required under applicable standards or contract terms;
 - d. each act or omission by TranSystems that the State contends constitutes negligence;
 - e. how these alleged acts or omissions caused or contributed to the State's alleged damages;
 - f. whether such alleged acts or omissions by TranSystems are also alleged to constitute a breach of any contract between TranSystems and the State; and
 - g. all Documents and Communications that support, relate to, or refute such allegations.
3. With respect to the State's allegations in Paragraph 143 of the Amended Complaint that TranSystems "*negligently failed to (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*", state and identify with specificity:
 - a. the manner in which TranSystems' inspection of the Washington Bridge in 2016 allegedly deviated from the standard of care customary in the professional engineering, consulting industry.
 - b. the manner in which TranSystems' inspection of the Washington Bridge in 2022 allegedly deviated from the standard of care customary in the professional engineering, consulting industry.
4. With respect to the State's allegations in Paragraph 143 of the Amended Complaint that TranSystems "*negligently failed to (c) recognize the importance and significance of the tie-down rods as critical to the stability of the Washington Bridge*", state and identify with specificity:
 - a. the factual basis for asserting that TranSystems failed to recognize the importance or significance of the tie-down rods;
 - b. the duty of care that was allegedly breached and the source of such duty;
 - c. when and how you contend TranSystems should have recognized the importance or significance of the tie-down rods;
 - d. the specific instructions, reports, or communications in which you contend this alleged failure should have been addressed;

- e. whether any other inspection firm or RIDOT personnel identified the tie-down rods as critical to the Washington Bride's stability prior to December 2023, and if so, identify the firm or individuals, the date, and the substance of the identification;
 - f. how these alleged acts or omissions caused or contributed to the States alleged damages;
 - g. whether the state contends that TranSystems' alleged failure also constitutes a breach of any contract between TranSystems and the State; and
 - h. all Documents and Communications that support, relate to, or refute such allegation.
5. With respect to the State's allegations in Paragraph 143 of the Amended Complaint that TranSystems "*negligently failed to (d) perform an investigation into or evaluation of the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams*", state and identify with specificity:
- a. the date(s), location(s) and scope of each inspection during which the State contends such cracking was present and should have been investigated or evaluated by TranSystems;
 - b. the factual basis for asserting that TranSystems failed to investigate or evaluate the cracking during those inspections;
 - c. each act or omission by TranSystems that the state contends was a breach of the applicable standard of care;
 - d. whether the State contends that any other inspection firm or RIDOT personnel identified or evaluated the same cracking, and if so, identify the firm or individual and the date and substance of the evaluation;
 - e. how the alleged failure caused or contributed to the State's alleged damages; and
 - f. all Documents and Communications that support, relate to, or refute such allegation.
6. With respect to the State's allegations in Paragraph 143 of the Amended Complaint that TranSystems "*negligently failed to (e) recommend repairs to address the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams*", state and identify with specificity:
- a. when and by whom you contend the alleged cracking was first discovered;
 - b. the specific repairs that you contend TranSystems should have recommended;
 - c. whether the State would have carried out such repairs had they been recommended by TranSystems;
 - d. whether the State contends that the implementation of any such repair would have prevented the emergency closure of the Washington Bridge in December 2023, and if so, identify which repair(s) the State would have carried out and when they would have been carried out;
 - e. how TranSystems' alleged failure caused or contributed to the State's alleged damages;

- f. whether the State contends that TranSystems' alleged failure also constitutes a breach of any contract between TranSystems and the State; and
 - g. all Documents and Communications that support, relate to, or refute such allegations.
- 7. With respect to the State's 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*", please itemize:
 - a. all claimed physical and economic 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 the State's damages were calculated.
- 8. With respect to each expert whom you will or may call to testify in your behalf at a trial of said case:
 - a. state the full name, address and field of specialization of each expert;
 - b. state the subject matter on which each expert is expected to testify;
 - c. state the substance of the facts and opinions to which each expert is expected to testify; and
 - d. give a summary of the grounds for each opinion.
- 9. Please identify by name, address, telephone number, email address, and current occupation, each person the State intends to call as a witness at the trial of this matter who the State will testify in any way relating to the State's claims against TranSystems.
- 10. Please identify all documents and thing the State intends to introduce into evidence at the trial of this matter which relate in any way to the State's claims against TranSystems.

/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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