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-2024-4526

DEFENDANT JACOBS ENGINEERING GROUP, INC.'S
FIRST SET OF INTERROGATORIES TO PLAINTIFF

Pursuant to Rule 33 of the Rhode Island Superior Court Rules of Civil Procedure, Defendant Jacobs Engineering Group, Inc. ("Jacobs") requests that Plaintiff the State of Rhode Island (the "State") answer the following interrogatories within forty-five (45) days of service hereof.

INSTRUCTIONS

1. In addition to the specific instructions below, these interrogatories incorporate by reference the instructions set forth in Rule 33 of the Rhode Island Superior Court Rules of Civil Procedure.

2. If you cannot answer fully, or if you object in part, to an interrogatory, please identify the reasons for your inability to answer and respond to the remaining portions to the extent you are capable of doing so and/or to the extent not objected to.

3. These interrogatories shall be deemed continuing in nature, and supplemental answers and responses are required if you obtain, directly or indirectly, further information of the nature sought herein between the time answers and responses are served and the time of trial. You are hereby notified that an order will be sought at trial barring the admission of any evidence responsive to any interrogatory, which you have failed to disclose.

4. If any information is withheld from your answer to an interrogatory based on a claim of privilege, please identify the withheld information, the specific grounds on which you claim the privilege, the person on whose behalf the privilege exists, and any person whom you know or believe has knowledge of such information. Please identify the withheld information with sufficient particularity to enable Jacobs and/or the Court to evaluate such claim of privilege.

5. Each interrogatory is to be read so as to give it the broadest possible meaning, so that, for example, when either of the terms "and" or "or" are used, they are to be construed as "and/or." Similarly, use of the singular also includes the plural, and use of any female pronoun also includes use of the male pronoun.

DEFINITIONS

The following definitions are deemed incorporated by reference and apply to all discovery requests:

"Action" refers to the above-captioned lawsuit, *State of Rhode Island v. AECOM Technical Services, Inc., et al.*, Case: No. PC-2024-4526.

"**Amended Complaint**" means the amended complaint that the State of Rhode Island filed in the Action on or around April 14, 2025.

"Eastbound Washington Bridge" means the I-195 eastbound Washington Bridge, formally known as Rhode Island Bridge No. 200, as defined in the Amended Complaint.

"Identify" or "identity" means:

1) When applied to an individual person, to state the person's (i) name; (ii) last known residence address and telephone number; (iii) occupation, employer, business address, and telephone number at the date of the event or transaction to which the interrogatory refers; (iv) present occupation, employer, business address, and telephone number; and (v) last known email address(es).

2) When applied to a document, to state the exact title, serial or identifying number(s) (if any), date, author(s), signer(s), intended recipient(s), actual recipient(s), addressee(s), and present custodian(s) of the document or, alternatively, to produce for inspection and copying the document itself provided you reference the interrogatory to which the document is responsive;

3) When applied to oral communication, to identify (as defined in subparagraph (1)) the speaker(s), the person(s) addressed, the person(s) present during the communication, the date, the place and medium of the communication(s), and in full detail the content of the communication(s).

"Including" means including without limitation.

"Jacobs" refers to Jacobs Engineering Group, Inc.

"Jacobs' 2021 inspection of the Washington Bridge" means Jacobs' routine, special, and underwater inspection of the Washington Bridge that it performed on or around June 21, 2021 through July 23, 2021.

"Person" means any individual, natural person, corporation, partnership, group, association, business, and/or governmental agency.

"Plaintiff," "State," and "You," mean the Plaintiff, the State of Rhode Island, and its agents and all other Persons acting on its behalf, including but not limited to, the Rhode Island Department of Transportation.

"Related to" or "relating to" means in whole or in part, without limitation, regarding, reflecting, concerning, considering, comprising, evidencing, evincing, explaining, involving, supporting, affecting, addressing, analyzing, constituting, containing, comprising, discussing, describing, identifying, rebutting, stating, commenting on, referring to, reporting on, in connection with, associated with, dealing with, consisting of, pertinent to, or any way pertaining to the subject matter of the inquiry.

"Washington Bridge" refers to the I-195 westbound Washington Bridge, formally known as Washington Bridge North No. 700, as defined in the Amended Complaint.

These definitions apply whether or not the defined word or phrase is capitalized and whether or not the defined word or phrase is used in a singular or plural form. Any undefined term should be given its usual dictionary definition.

INTERROGATORIES

INTERROGATORY NO. 1: Identify and describe in detail the relationship to the State of each person who prepared or assisted in the preparation of the answers to any interrogatories served by Jacobs on the State in the Action, including any person who contributed subject matter

knowledge, and state the specific answers that each person prepared or assisted in the preparation of.

INTERROGATORY NO. 2: Identify all documents relating to and persons involved in Jacobs' 2021 inspection of the Washington Bridge, and for each identified person describe in detail how that person was involved, provide the time period of that person's involvement, and provide that person's role and job responsibilities.

INTERROGATORY NO. 3: Describe in detail all problems related to the Washington Bridge's tie-down rods, including but not limited to, (i) providing a detailed description of such problems; (ii) providing all facts demonstrating the existence of such problems; (iii) stating when and how the State learned of such problems; (iv) stating whether, when, and how the State informed Jacobs of such problems; (v) identifying all persons involved with or having knowledge of such problems; and (vi) identifying all documents related to such problems.

INTERROGATORY NO. 4: Describe in detail all problems related to the Washington Bridge's post-tensioned cantilever beams and post-tensioning system, including but not limited to, (i) providing a detailed description of such problems; (ii) providing all facts demonstrating the existence of such problems; (iii) stating when and how the State learned of such problems; (iv) stating whether, when, and how the State informed Jacobs of such problems; (v) identifying all persons involved with or having knowledge of such problems; and (vi) identifying all documents related to such problems.

INTERROGATORY NO. 5: Identify all contracts between Jacobs and the State relating to Jacobs' 2021 inspection of the Washington Bridge, state the specific provisions of such contracts Jacobs breached, describe in detail how Jacobs breached such contracts, identify all persons with knowledge or involvement in such breaches, and identify all documents related to such breaches.

INTERROGATORY NO. 6: Describe in detail any extra-contractual duties Jacobs owed the State in connection with Jacobs' 2021 inspection of the Washington Bridge, provide a detailed explanation of the basis for such duties, describe in detail how Jacobs breached such duties, and identify all documents related to the existence or breach of such duties.

INTERROGATORY NO. 7: Provide all facts and identify all documents supporting the State's allegation in Paragraph 171 of the Amended Complaint that Jacobs breached its inspection contract 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 contract;

(c) perform evaluations and report to the State as required by the contract;

(d) recommend needed repairs in accordance with the requirements of the contract; and

(e) otherwise comply with its contractual obligations.

INTERROGATORY NO. 8: Provide all facts and identify all documents supporting the State's allegations in Paragraph 176 of the Amended Complaint that Jacobs breached its duty of care by failing to:

(a) conduct a reasonably adequate 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-tensioned cables in the post-tensioned cantilever beams;

(e) recommend repairs to address the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams;

(f) ensure they possessed adequate technical competence, experience, and skill to perform the work; and

(g) honestly convey their past experience and competence when soliciting to be chosen by the State to perform the work.

INTERROGATORY NO. 9: Describe in detail any increased wear and tear damage that the Eastbound Washington Bridge has suffered due to the closure of the Washington Bridge, including but not limited to, (i) calculating the amount of wear and tear damage; (ii) providing all facts supporting such calculation; (iii) identifying all persons with knowledge of the wear and tear damage; and (iv) identifying all documents related to the wear and tear damage.

INTERROGATORY NO. 10: Describe in detail the State's policies, procedures, guidelines, instructions, requirements, and protocols that governed Jacobs' 2021 inspection of the Washington Bridge, provide all facts supporting the same, identify all persons with knowledge of the same, and identify all documents related to the same.

INTERROGATORY NO. 11: Describe in detail the State's roles and responsibilities in connection with Jacobs' 2021 inspection of the Washington Bridge, provide all facts supporting the same, identify all persons with knowledge of the same, and identify all documents related to the same.

INTERROGATORY NO. 12: Identify all documents that were provided or otherwise made available to Jacobs in connection with Jacobs' 2021 inspection of the Washington Bridge and for each document identify who provided the document and the date it was provided.

INTERROGATORY NO. 13: Describe in detail the State's policies, procedures, guidelines, instructions, requirements, and protocols that governed work candidates or repair recommendations for the Washington Bridge in 2021, provide all facts supporting the same, identify all persons with knowledge of the same, and identify all documents related to the same.

INTERROGATORY NO. 14: Describe in detail any and all money, funding, grants, subsidies, or other resources that the State has received and/or expects to receive related to the closure, demolition, or replacement of the Washington Bridge, including (i) the specific purpose of each payment; (ii) who made such payment; (iii) the amount of the payment; (iv) the date of the payment; (v) the identity of all persons with knowledge of the payment; and (vi) the identity of documents sufficient to evidence the payment.

INTERROGATORY NO. 15: Describe in detail the "known deteriorating condition of the Washington Bridge" alleged in paragraph 71 of the Amended Complaint, including but not limited to, (i) explaining the nature of such condition; (ii) providing all facts demonstrating such condition; (iii) identifying all persons with knowledge of such condition; and (iv) identifying all documents related to such condition.

INTERROGATORY NO. 16: State which, if any, of the problems alleged in paragraphs 92–95 of the Amended Complaint that the State contends were present during Jacobs' 2021 inspection of the Washington Bridge, provide all facts supporting any such contentions, identify all persons with knowledge supporting such contentions, and identify all documents supporting such contentions.

INTERROGATORY NO. 17: State whether you contend that Jacobs was required to perform a load rating analysis, fracture critical analysis, non-redundant steel tension member analysis, agency defined elements material testing analysis, or any other analysis, assessment, or inspection of the Washington Bridge besides a routine, special, or underwater inspection (as defined by the National Bridge Inspection Standards), and specify which specific analyses Jacobs was required to perform, provide all facts supporting your contention, identify all persons with knowledge to support your contention, and identify all documents supporting your contention.

INTERROGATORY NO. 18: State whether you contend that Jacobs was required to submit work candidates or make repair recommendations for the Washington Bridge, provide all facts supporting such a contention, identify all persons with knowledge to support such a contention, and identify all documents supporting such a contention.

INTERROGATORY NO. 19: Describe in detail any decisions to forego repairs or rehabilitation of the Washington Bridge, including but not limited to, (i) explaining the nature of such decisions; (ii) providing all facts supporting such decisions; (iii) identifying all persons involved in making or with knowledge of such decisions; and (iv) identifying all documents related to such decisions.

INTERROGATORY NO. 20: Describe in detail the State's alleged damages, including but not limited to, (i) calculating all alleged damages by category; (ii) providing all facts supporting such calculation; (iii) identifying all persons with knowledge of the State's alleged damages; and (iv) identifying all documents supporting or relating to the State's alleged damages.

/s/ Michael R. Creta

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Dated: September 24, 2025

CERTIFICATE OF SERVICE

I hereby certify that, on September 24, 2025, I served this document through the Rhode Island Judiciary's electronic filing system on all registered users.

/s/ Michael R. Creta
Michael R. Creta