

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 REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Pursuant to Rule 34 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”) produce for inspection the following documents in its possession, custody, or control within forty-five (45) days of service.

**INSTRUCTIONS**

1. In addition to the specific instructions below, these requests for production incorporate by reference the instructions set forth in Rule 34 of the Rhode Island Superior Court Rules of Civil Procedure.

2. The State is required to produce all requested documents which are in its possession, custody or control, including but not limited to documents in the possession of its attorneys, agents, representatives, and any other person acting or purporting to act on its behalf.

3. These requests for production 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 request for production, which you have failed to disclose.

4. If any document is withheld from production based on a claim of attorney-client privilege or other grounds (such as work product doctrine), provide a privilege log that contains the following information with respect to each document: (i) the date of the document; (ii) the identity of the author(s) of the document, including their respective title or position; (iii) the recipient(s) or addressees of the document, including any copyees, and their respective titles or positions; (iv) the nature of the privilege or other protection asserted; and (v) a description of the subject matter of the document sufficient to enable Jacobs and/or the Court to evaluate such claim of privilege or protection.

5. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, providing as much of the following information as possible: the type of document, its date, the date or approximate date it was lost, discarded or destroyed, the circumstances and manner in which it was lost, discarded or destroyed, the reason or reasons for disposing of the document (if discarded or destroyed), the identity of all persons authorizing or having knowledge of the circumstances surrounding the

disposal of the document, the identity of all persons who lost, discarded or destroyed the document, and the identity of all persons having knowledge of the contents hereof.

6. If a document was prepared in several copies, or if additional copies were thereafter made, and if any such copies were not identical or are no longer identical by any reason of subsequent notation or modification of any kind whatsoever, including, without limitation, notations on the front or back of the document, such non-identical copies must be produced.

7. You must comply with Rhode Island Superior Court Rule of Civil Procedure 34(b) by producing the requested documents as they are kept in the usual course of business or by organizing and labeling them to correspond with the categories in this request.

### **DEFINITIONS**

The following definitions apply to each of the requests for production and shall be deemed incorporated therein:

**“Action”** refers to the above-captioned lawsuit, *State of Rhode Island v. AECOM Technical Services, Inc., et al.*, Case: No. PC-2024-04526.

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

**“Communication”** means any transfer, exchange, disclosure, or transmission of ideas, information, or words, without regard to the method used (e.g., oral, electronic, or written), including, without limitation, person to person, by telephone, by mail, via electronic mail, personal delivery, or otherwise. **“Communication”** includes, without limitation, conversations, negotiations, meetings, conferences, speeches, memoranda, letters, emails, and notes.

**“Document”** should be interpreted in the broadest possible manner and includes any written, graphic, printed, typed, photocopied, photographic, electronic, magnetic, laser, recorded

or tangible matter of any kind or character, or any recorded material, however produced or reproduced, whether prepared by you or otherwise, including all papers, books, records, transcripts, drafts, contracts, diaries, calendars, desk pads, minutes, lists of attendees, brochures, pamphlets, advertisements, circulars, press releases, correspondence, telephone records, communications, telegrams, teletypes, memoranda, notes, studies, work papers, summaries, analyses, reports, notebooks, manuals, guidelines, rules, instructions, operating procedures, drawings, blueprints, mylars, models, graphs, charts, maps, films, videotapes, photographs, electronic data storage materials, email, tapes, diskettes, digitally recorded information, lists, minutes, and entries in books of account, bills and invoices and also including every copy of a document that is not identical to the original (whether because of notes made on or attached to such copy or otherwise). **“Document”** includes all electronic data and **Communications** as defined above.

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

**“Including”** means including without limitation.

**“Jacobs”** refers to Defendant 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”** means 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.

### **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** All documents relating to the design or construction of the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 2:** All documents relating to the inspection or assessment of the Washington Bridge, including but not limited to, all inspection reports and underlying materials supporting the same

**REQUEST FOR PRODUCTION NO. 3:** All documents relating to the maintenance of the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 4:** All documents relating to the repair or rehabilitation of the Washington Bridge, including but not limited to, all documents related to any decisions to forego repairs or rehabilitation.

**REQUEST FOR PRODUCTION NO. 5:** All documents relating to the closure of the Washington Bridge in December 2023.

**REQUEST FOR PRODUCTION NO. 6:** All reports, analyses, assessments, evaluations, or other documents relating to the condition, capacity, or structural integrity of the Washington Bridge, including all underlying documents supporting the same.

**REQUEST FOR PRODUCTION NO. 7:** All load rating reports, analyses, assessments, or other similar documents for the Washington Bridge, including all underlying documents supporting the same.

**REQUEST FOR PRODUCTION NO. 8:** All reports, analyses, assessments, or other similar documents for fracture critical members or non-redundant steel tension members for the Washington Bridge, including all underlying documents supporting the same.

**REQUEST FOR PRODUCTION NO. 9:** All material testing reports, analyses, assessments, or other similar documents for the Washington Bridge, including all underlying documents supporting the same.

**REQUEST FOR PRODUCTION NO. 10:** All reports, analyses, assessments, or other similar documents for agency defined elements for the Washington Bridge, including all underlying documents supporting the same.

**REQUEST FOR PRODUCTION NO. 11:** All contracts and agreements between Jacobs and the State relating to the Washington Bridge, including but not limited to, all contracts and

agreements relating to Jacobs' 2021 inspection of the Washington Bridge and the "2019 inspection contract" referenced in paragraph 169 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 12:** All documents relating to Jacobs' 2021 inspection of the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 13:** All documents that were provided or made available to Jacobs in connection with Jacobs' 2021 inspection of the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 14:** All documents that Jacobs provided or made available to the State in connection with Jacobs' 2021 inspection of the Washington Bridge, including but not limited to, Jacobs' inspection report and the underlying materials supporting the same.

**REQUEST FOR PRODUCTION NO. 15:** All documents relating to amounts paid to Jacobs in connection with Jacobs' 2021 inspection of the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 16:** All documents relating to the Washington Bridge's post-tensioned cantilever beams and post-tensioning system, including but not limited to, all documents relating to the deterioration of such beams and system.

**REQUEST FOR PRODUCTION NO. 17:** All documents relating to the Washington Bridge's tie-down rods, including but not limited to, all documents relating to the tie-down rods failing, fracturing, or otherwise being compromised.

**REQUEST FOR PRODUCTION NO. 18:** All policies, procedures, guidelines, instructions, requirements, protocols, and other similar documents related to the inspection, repair, or rehabilitation of the Washington Bridge, including but not limited to, all such documents governing Jacobs' 2021 inspection of the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 19:** All photographs and videos of the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 20:** The original design plans, specifications, structural calculations, shop drawings, and other similar documents for the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 21:** All inspection, maintenance, and repair documents related to the Washington Bridge, including but not limited to, repair records, inspection reports, condition assessments, safety evaluations, compliance certificates, service records, work orders, maintenance schedules, inspection checklists, daily reports, weekly reports, monthly reports, and time sheets.

**REQUEST FOR PRODUCTION NO. 22:** All documents relating to budgets or estimates for inspection, maintenance, repair, or rehabilitation costs associated with the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 23:** All documents relating to inspection, maintenance, repair, or rehabilitation costs that were incurred for the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 24:** All documents relating to the Lichtenstein Report referenced in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 25:** All documents relating to the 1996–1998 rehabilitation of the Washington Bridge referenced in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 26:** All documents relating to or supporting paragraphs 46–65 in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 27:** All documents relating to the Cardi Corporation Contract referenced in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 28:** All documents relating to or evidencing the “known deteriorating condition of the Washington Bridge” as alleged in paragraph 71 of the



Amended Complaint, including but not limited to, documents establishing when such condition was first known to the State.

**REQUEST FOR PRODUCTION NO. 29:** The inspection contracts and inspection reports, including all underlying materials supporting the same, referenced in paragraph 74 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 30:** All documents relating to or supporting paragraphs 76–91 in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 31:** All documents relating to or supporting the alleged “existence of unaddressed voids, poor grout, moisture, and corrosion, resulting in widespread deterioration of the post-tensioning system,” as alleged in paragraph 95 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 32:** All documents relating to alleged wear and tear damage to the Eastbound Washington Bridge.

**REQUEST FOR PRODUCTION NO. 33:** All documents relating to work candidates or repair recommendations for the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 34:** An inspection of all tie-down rods that were previously in the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 35:** An inspection of all post-tensioned cantilever beams that were previously in the Washington Bridge.

**REQUEST FOR PRODUCTION NO. 36:** All documents relating to Wiss, Janney, Elstner Associates, Inc.’s (“WJE”) April 5, 2024 report concerning the Washington Bridge, including but not limited to, all documents referenced in such report, all documents WJE reviewed

or relied upon in connection with such report, all communications regarding such report or the analyses therein, and all documents provided to WJE in connection with such report.

**REQUEST FOR PRODUCTION NO. 37:** All documents relating to the decision to reroute traffic onto the Eastbound Washington Bridge after the closure of the Washington Bridge in December 2023, as alleged in paragraph 101 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 38:** All documents relating to or supporting the allegation in paragraph 102 of the Amended Complaint that “increased traffic volume has resulted in physical wear and tear damage” to the Eastbound Washington Bridge.

**REQUEST FOR PRODUCTION NO. 39:** All documents relating to or supporting the allegation in paragraph 103 of the Amended Complaint that “[d]ue to the increased traffic volume on the Eastbound Washington Bridge since the emergency closure of the Washington Bridge, there has been wear and tear to the Eastbound Washington Bridge that would not have otherwise occurred.”

**REQUEST FOR PRODUCTION NO. 40:** All documents relating to the allegation in paragraph 105 of the Amended Complaint that “physical maintenance is required on a more frequent basis to keep the Eastbound Washington Bridge in safe operating condition.”

**REQUEST FOR PRODUCTION NO. 41:** All documents relating to the allegation in paragraph 106 of the Amended Complaint that “the State has had to install advanced monitoring systems, including real-time sensors and structural health monitoring equipment, to track the structural health and integrity of the Eastbound Washington Bridge in order to ensure ongoing public safety.”

**REQUEST FOR PRODUCTION NO. 42:** All documents relating to the condition of the Eastbound Washington Bridge, including but not limited to, whether it is safe for travel and if there are any public safety concerns related to the Eastbound Washington Bridge.

**REQUEST FOR PRODUCTION NO. 43:** All documents relating to or supporting the State's determination that the Washington Bridge was beyond repair and needed to be demolished.

**REQUEST FOR PRODUCTION NO. 44:** All documents relating to or supporting the allegation in paragraph 171 of the Amended Complaint that Jacobs "breached its inspection contract."

**REQUEST FOR PRODUCTION NO. 45:** All documents relating to or establishing the duties alleged in paragraphs 174 and 175 of the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 46:** All documents relating to or supporting the allegation in paragraph 176 of the Amended Complaint that Jacobs "breached its duty of care."

**REQUEST FOR PRODUCTION NO. 47:** All documents supporting the allegations in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 48:** All documents referenced in the Amended Complaint.

**REQUEST FOR PRODUCTION NO. 49:** All documents supporting or relating to the State's claims for damages, including but not limited to, the State's allegation in the Amended Complaint that it has suffered "millions of dollars in damages."

**REQUEST FOR PRODUCTION NO. 50:** All documents referenced in any of the State's discovery responses or answers in the Action.

**REQUEST FOR PRODUCTION NO. 51:** All documents the State intends to introduce, use, or rely upon in the Action, including but not limited to, all documents that the State intends to introduce, use, or rely upon at any hearing or at trial.

**REQUEST FOR PRODUCTION NO. 52:** All documents related to, used, or considered by each expert the State intends, expects, or may call as a witness, including any opinions rendered, any documents upon which each opinion is based, any document considered by each expert in formulating each opinion, any documents authored or contributed to and all presentations given or participated in by such expert, all documents that the State has provided to or made available to each expert, and all documents that each expert has shown to the State.

/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