

STATE OF RHODE ISLAND
PROVIDENCE COUNTY

SUPERIOR COURT

STATE OF RHODE ISLAND,

Plaintiff,

v.

C.A. No. PC-2024-04526

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.,
TRANSYSSTMS CORPORATION, and
VANASSE HANGEN BRUSTLION, INC.

Defendants.

**DEFENDANT BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2
JV, THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
PLAINTIFF**

Defendant, Barletta/Aetna I-195 Washington Bridge North Phase 2 JV (“JV”), by and through the undersigned counsel and pursuant to Rule 34 of the Rhode Island Rules of Civil Procedure, hereby serves its Third Set of Requests for Production on Plaintiff, the State of Rhode Island (“State”), and requests that the State produce and/or permit inspection of each item requested below within forty (40) days of service at the office of Lynch & Pine, 1 Park Row Fifth Floor, Providence, Rhode Island 02903.

INSTRUCTIONS

1. When responding to this document request, you are asked to furnish all information in your possession, custody or control, or in that of your attorneys, employees, agents, or any other person acting on your behalf or on whose behalf you are acting. A document is deemed to be in your possession, custody or control if you have physical custody of the document, if you have a right, by agreement or otherwise, to inspect and examine the document or if, as a practical matter, you have been granted access to the document.

2. If you withhold any document because you object to the request for the document on grounds of privilege, work product, confidentiality, or privacy, specify with particularity: (1) the reason(s) for withholding; (2) the portion of this demand (*i.e.*, request number or numbers) to which each withheld document is responsive; (3) the parties to the document (*e.g.*, addressers, addressees and intended recipients of copies); (4) the date of the document; (5) the subject matter of the document; (6) the length in pages of the document; (7) the location of the document; and (8) the custodian of the document.

3. If any document responding to all or any part of any document request is not currently available, include a statement to that effect and furnish whatever documents are available. Include in your statement when such documents were most recently in your possession or subject to your control and what disposition was made of them, and identify by name, job title and the last known business address, each PERSON currently in possession or control of such documents. If any such documents have been destroyed, identify by name, job title and the last known business address, each PERSON who directed that the documents be destroyed, the PERSON(S) actually destroying the documents, and state the reasons the documents were destroyed. Also, if a log or list of such destroyed documents was prepared, produce that log or list.

4. If you are unable to produce any documents in response to a request after exercising due diligence to do so, please so state and then answer the Request as completely as possible, explaining why you are unable to secure the documents sought by the Request.

5. All responsive documents or communications, whether stored or maintained in hardcopy or as electronically stored information (“ESI”) shall be produced electronically pursuant to the Stipulation Regarding Discovery of Electronically Stored Information.

6. These requests for production shall be deemed continuing in nature so as to require you to promptly amend or supplement any responses upon discovery of any additional documents which are responsive, or in the event that a response, though correct when made, is later discovered to have been incorrect in fact.

DEFINITIONS

1. The terms “**PLAINTIFF**,” “**STATE**,” “**RIDOT**,” “**YOU**,” or “**YOUR**” shall mean the Plaintiff, State of Rhode Island, acting through the Rhode Island Department of Transportation, and/or its agents and all other persons acting on its behalf.

2. The terms “**DEFENDANT**” or “**JV**” mean Barletta/Aetna I-195 Washington Bridge North Phase 2 JV, together with their affiliates, agents, trustees, employees, representatives, predecessors, or anyone else acting on their behalf.

3. The term “**PERSON**” means any natural person, entity or organization, including any divisions, departments, subsidiaries, or other units thereof.

4. The terms “**RELATE TO**,” “**REFER TO**,” or “**REGARDING**,” as well as all tenses and forms thereof, shall be used in their broadest sense and mean constituting, respecting, relating, regarding, concerning, referring or pertaining to, stating, establishing, showing, reflecting, describing, recording, noting, embodying, mentioning, constituting, evidencing, containing, analyzing, discussing, supporting, verifying, rebutting, refuting, negating, contradicting, comprising, memorializing, identifying, and/or in any way involving or having a logical connection to the subject matter of the request, in whole or in part.

5. The term “**WASHINGTON BRIDGE**” refers to 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.

6. The words “and” and “or” should be read inclusively, as “and/or.”

7. The words “any” and “all” should be read inclusively, as “any/all.”

8. References to the singular shall include the plural and references to the plural shall include the singular.

9. The use of a verb in any tense shall be construed as the use of the verb in that and all other tenses.

REQUESTS FOR PRODUCTION

53. All text messages and emails between or among Governor Daniel J. McKee and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

54. All text messages and emails between or among Deputy Chief of Staff T. Joseph Almond and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

55. All text messages and emails between or among Peter Alviti, Jr., P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

56. All text messages and emails between or among Robert Rocchio, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING THE WASHINGTON BRIDGE, from January 1, 2017 to the present.

57. All text messages and emails between or among Lori Fisette and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or

any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

58. All text messages and emails between or among Loren Doyle and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

59. All text messages and emails between or among John Preiss, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

60. All text messages and emails between or among Dawn Cruz and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

61. All text messages and emails between or among Anthony Pompei, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

62. All text messages and emails between or among Keith Gaulin, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

63. All text messages and emails between or among Ryan Salvas and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

64. All text messages and emails between or among Chris Hart P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

65. All text messages and emails between or among David Fish and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

66. All text messages and emails between or among Anthony Marchetti and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

67. All text messages and emails between or among Sean Raymond P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

68. All text messages and emails between or among Brian Ferguson and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or

any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

69. All text messages and emails between or among John Iglioizzi and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

70. All text messages and emails between or among Anthony Mako and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

71. All text messages and emails between or among Steve Ricci, Sr. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

72. All text messages and emails between or among Alecia Brouillette and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

73. All text messages and emails between or among David Walsh and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

74. All text messages and emails between or among Steve Almagno and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

75. All text messages and emails between or among James Orr, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

76. All text messages and emails between or among Steven Soderlund and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

77. All text messages and emails between or among George Ley, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

78. All text messages and emails between or among Anthony Cimaglia, III and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017 to the present.

Dated: October 1, 2025

Respectfully submitted,

FOLEY & LARDNER LLP

/s/ Jeffrey R. Blease

Jeffrey R. Blease (MB #675247)
111 Huntington Avenue, Suite 2500
Boston, MA 02199
jblease@foley.com
Admitted Pro Hac Vice

Benjamin J. Morris (CB #260148)
11988 El Camino Real, Suite 400
San Diego, CA 92130
bmorris@foley.com
Admitted Pro Hac Vice

Christopher D. Mellado (FB #1018915)
301 E. Pine Street, Suite 1200
Orlando, FL 32801
chris.mellado@foley.com
Admitted Pro Hac Vice

Matthew Kass (WB #1121980)
777 E. Wisconsin Avenue
Milwaukee, WI 53202
mkass@foley.com
Admitted Pro Hac Vice

*Lead Counsel for Barletta/Aetna I-195
Washington Bridge North Phase 2 JV and
Barletta*

LYNCH & PINE

/s/ Jeffrey B. Pine
Jeffrey B. Pine #2278
1 Park Row, 5th Floor
Providence, Rhode Island 02903
jpine@lynchpine.com

*Attorney for Barletta/Aetna I-195 Washington
Bridge North Phase 2 JV and Barletta*

KELLY, SOUZA, PARMENTER & RESNICK, P.C.

/s/ Jackson C. Parmenter
Jackson C. Parmenter #8396

128 Dorrance Street, Suite 300
Providence, Rhode Island 02903
jparmenter@ksprlaw.com

*Attorney for Barletta/Aetna I-195 Washington
Bridge North Phase 2 JV and Lead Counsel
for Aetna*

CERTIFICATE OF SERVICE

I hereby certify that this document was served through the Odyssey File & Serve System, and will be sent electronically to the registered participants as identified on the Case Service Contacts List and/or paper copies will be sent, postage pre-paid, to those indicated as non-registered participants on this 1st of October, 2025. The document is further available for viewing and/or downloading from the System.

/s/ Jeffrey B. Pine
Jeffrey B. Pine #2278