

STATE OF RHODE ISLAND  
PROVIDENCE, SC.

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

*Defendants.*

**BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV'S**  
**MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO COMPEL**

## TABLE OF CONTENTS

INTRODUCTION: .....	1
BACKGROUND: .....	2
LEGAL STANDARD: .....	6
ARGUMENT: .....	7
I. THE DELIBERATIVE PROCESS PRIVILEGE DOES NOT APPLY IN THIS CASE .....	7
II. THE STATE’S REDACTIONS CONFIRM ITS MISUSE OF THE DELIBERATIVE PROCESS PRIVILEGE .....	10
III. THE STATE’S “NON-RESPONSIVE” DESIGNATIONS ARE IMPROPER AND CANNOT JUSTIFY REDACTIONS.....	11
CONCLUSION.....	12

Defendant/Counter-Plaintiff Barletta/Aetna I-195 Washington Bridge North Phase 2 JV, a joint venture comprised of Barletta Heavy Division, Inc. (“**Barletta**”) and Aetna Bridge Company (“**Aetna**”) (collectively, the “**JV**”), by and through the undersigned counsel, respectfully moves this Court for an order (the “**Motion**”) overruling the State’s objections and compelling Plaintiff/Counter-Defendant, the State of Rhode Island (“**State**”) to:

1. Produce, in full and without redactions, all responsive documents and communications that the State has either withheld entirely or produced in redacted form based on an assertion of the deliberative process privilege in response to the JV’s discovery requests; and
2. Remove all improper non-responsive redactions reflected in its privilege log, and refrain from using “non-responsive” as a basis for redacting documents where no privilege is claimed.

### **INTRODUCTION:**

The State’s sweeping assertion of the “deliberative process privilege” is improper, unsupported, and is interfering with the orderly advancement of discovery, which will jeopardize the deadlines in the current Scheduling Order. This litigation involves the State’s misplaced allegations of purported wrongdoing by multiple defendants based upon an expansive history of documents, communications, and decision-making regarding the Washington Bridge — a history that spans decades. Yet, while placing its own decision-making processes at the heart of its claims, the State attempts to cloak from view evidence against it by claiming an inapplicable privilege to avoid discovery of documents central to this case.

The JV’s challenge to the State’s misuse of the privilege is straightforward:

First, long established Rhode Island law confirms the privilege does not apply in this case. By initiating this action, the State put its decisions, internal communications, and processes regarding the Washington Bridge's rehabilitation and/or replacement squarely at issue, waiving any protection under the deliberative process privilege.

Second, the documents the State has redacted citing the privilege confirm its overreach and misapplication. Representative examples discussed herein include routine factual records and communications, and a forwarded news article — none of which fall within the conceptual limits of pre-decisional, policy-formulating deliberations.

Separately, and as a distinct issue from its assertion of the deliberative process privilege, the State asserts “non-responsive” as a basis for privilege and, correspondingly, for redacting documents. Non-responsive designations are not a recognized privilege and have no foundation for redactions. Moreover, the State's “non-responsive” entries include fully or partially redacted material plainly related to the core issues in this case, further casting doubt on the State's responsiveness review.

The State has represented during meet-and-confers that it is not withholding any documents entirely under its privilege assertions; instead, it has produced documents with large portions (or the entirety) obscured by redactions. The JV seeks full, unredacted production of those materials, and an order directing that any future productions likewise be free of improper deliberative process or non-responsive redactions, so that the parties do not need to return to the Court on this same issue.

### **BACKGROUND:**

This discovery dispute arises from the JV's first and second sets of Requests for Production of Documents to the State: the JV's First Request for Production of Documents (“**RFP**”), served

June 13, 2025; and the JV's Second RFP, served June 20, 2025. The State responded to both sets of RFPs on September 2, 2025, and made a contemporaneous document production. *See* **Exhibit A**, State's September 2, 2025 Responses to the JV's RFP Set One; and **Exhibit B**, the State's September 2, 2025 Responses to the JV's RFP Set Two.

The State objected based on the deliberative process privilege in nearly all of its responses (RFP Nos. 1–4, 6–7, 10–13, 15–42, and 46–52) — and produced documents with portions redacted on that basis. The State has produced three separate privilege logs, each reflecting documents redacted in whole or in part under its deliberative process privilege claim and, in some instances, its improper “non-responsive” designation: **Exhibit C** (April 1, 2025), **Exhibit D** (October 15, 2025), and **Exhibit E** (November 17, 2025).

The JV sent a detailed deficiency letter on October 3, 2025 (**Exhibit F**) addressing the issues raised by its Motion. The letter explained why the deliberative process privilege is inapplicable in this case, outlined the applicable law, identified deficiencies in the State's privilege log, and listed specific examples of produced documents with improper redactions.

The State responded in writing on October 31, 2025 (**Exhibit G**), without addressing the specific privilege log challenges in the JV's deficiency letter. As to the deliberative process issue, the State unequivocally stated that, “we disagree with your assertion that the State has waived its ability to assert the deliberative process privilege over some of its documents . . .”

Thereafter, the parties met and conferred on November 4, 2025, where the State reiterated its position that the privilege applies in this case and that the State's redactions were proper. The State indicated it may withdraw some redactions following review, but committed to standing on others.

Following this meeting, the State emailed the JV stating:

Please find attached our updated privilege log. The previously withheld documents, which are now being released, will be served tomorrow. ***In reviewing the privilege log, please note there are three categories of documents:*** 1) documents being withheld and the privilege being asserted; 2) redacted documents, along with the basis for their redactions; and 3) ***documents that were previously withheld but are now being produced.***

(Exhibit E). This representation has proven inaccurate, particularly as to category #3. Numerous entries previously marked as privileged have simply vanished from the updated log without explanation, leaving the JV to guess whether those documents are being produced, remain withheld, or are otherwise unaccounted for.

The difficulty in tracking and assessing the State's privilege assertions is compounded by the scale of production: the State has produced *thousands of documents* across *seven separate production volumes*. In this context, the State's piecemeal and shifting use of multiple privilege logs, unexplained designation changes, and sporadic "cures" months after production has resulted in a privilege record so disorganized that neither the JV nor the Court can conduct a meaningful review.

The chart below captures several examples highlighted in the JV's October 3 deficiency letter. The JV's letter to the State prompted the State's October 15 and November 17 updated privilege logs, as well as a November 18 supplemental production that partially cured previously withheld materials. The chart demonstrates the State's inconsistent handling of its asserted privilege over time, showing documents cycling through different designations, disappearing entirely from logs, and reappearing only after cure.

<b>RIDOT Production<sup>1</sup></b>	<b>Apr 2025 Priv Log Designation:</b>	<b>Oct 2025 Priv Log Designation:</b>	<b>Nov 2025 Priv Log Designation:</b>	<b>Current Status:</b>
000003165–000003169	Deliberative Process	Non-Responsive Materials	<u>Not</u> captured on updated log	<u>Remains redacted</u>
000003424–000003427	Deliberative Process	Non-Responsive Materials	<u>Not</u> captured on updated log	<u>Remains redacted</u>
000011423–000011433	Deliberative Process	Non-Responsive Materials / Personal Information	Captured, privilege removed	Cured via Nov 18 production
000010411–000010413	Deliberative Process	Deliberative Process	Deliberative Process	State standing on objection
000004388–000004389	Deliberative Process	Deliberative Process	Captured, privilege removed	Cured via Nov 18 production
000004816–000004822	Deliberative Process	Deliberative Process	<u>Not</u> captured on updated log	Cured via Nov 18 production

This record actively impedes meaningful privilege review by either the JV or the Court. Despite the JV’s June RFPs, agreed extension for State responses, detailed deficiency letter, and good-faith meet-and-confer, the State has refused to withdraw its deliberative process objections or produce unredacted materials. Its multi-log, shifting designations and unexplained removals force the JV to devote substantial resources simply to reconstruct what has been withheld, changed, or cured, a burden made worse by the enormous production size.

In multiple instances, the State has invoked the deliberative process privilege to withhold entirely innocuous material, only to lift redactions months later. One example is RIDOT\_000004816–RIDOT\_000004822, initially redacted under the deliberative process label. When “cured,” the production revealed only two short, routine emails — one from RIDOT to

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<sup>1</sup> True and correct copies of the specific bates-stamped documents referenced herein — which were produced by the State in this litigation — are attached as a composite exhibit to the Declaration of Jeffrey Blease filed in support of this Motion. These documents have been filed confidentially with the Court through the Court’s electronic filing system.

FHWA stating “Sorry Anthony, looping you on the same FHWA email” and FHWA’s reply, “Got it. Thanks Keith.” That this trivial exchange was redacted under a deliberative process claim and underscores the over-designation and inapplicability at play.

Such conduct consumes the resources of the JV and the Court, obscures the true scope of the asserted privilege, and forces the JV to guess at what remains withheld and redacted. Judicial intervention is necessary to resolve the present dispute and to prevent similar tactics in forthcoming productions.

### **LEGAL STANDARD:**

Rhode Island Superior Court Rule 26(b)(1) grants litigants the right to obtain information “regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action.” R.I. Super. R. Civ. P. 26(b)(1). If a party fails to comply with a discovery request, Rule 37(a)(2) empowers the requesting party to seek court intervention:

[i]f a party, in response to a request for production or inspection submitted under Rule 34, fails to respond that inspection will be permitted as requested or fails to permit inspection as requested, the discovering party may move for an order compelling an answer, or a designation, or an order compelling production or inspection in accordance with the request.

R.I. Super. R. Civ. P. 37(a)(2).

Rule 26(b)(5) further requires that any claim of privilege be supported with enough detail to enable both the requesting party and the Court to evaluate whether the privilege applies. R.I. Super. R. Civ. P. 26(b)(5). The burden rests with the party asserting the privilege to demonstrate its applicability. *Id.* If the party fails to meet that burden, and responsive materials are withheld or redacted without adequate support, Rule 37(a)(2) permits the Court to compel production. R.I. Super. R. Civ. P. 37(a)(2).



## ARGUMENT:

### I. THE DELIBERATIVE PROCESS PRIVILEGE DOES NOT APPLY IN THIS CASE

The deliberative process privilege is narrow and “rests on a policy of affording reasonable security to the decision-making process within a government agency. The privilege precludes from disclosure documents reflecting advisory opinions, recommendations, and deliberations compromising a process by which governmental decisions and policies are formulated.” *Rhode Island Economic Development Corp. v. Wells Fargo Securities, LLC*, No. PB125616, 2014 WL 3407982, at \* 2 (R.I. Super. July 7, 2014) (quoting *Texaco Puerto Rico, Inc. v. Dep’t of Consumer Affairs*, 60 F.3d 867, 884 (1st Cir. 1995)). Courts consider a two-prong analysis in determining whether the privilege applies; namely:

whether the document was both [1] ‘pre-decisional’ and [2] ‘deliberative.’ “A document is pre-decisional if it is ‘prepared in order to assist an agency decisionmaker in arriving at his decision.’” Further, a document is “deliberative such that it ‘makes recommendations or expresses opinions on legal or policy matters.’”

*Id.* (citing *Heritage Healthcare Servs., Inc. v. Beacon Mut. Ins. Co., et al.*, PC-02-7016, 2007 WL 1234481, at \*14 (R.I. Super. Apr. 17, 2007), *Nadler v. U.S. Dep’t of Justice*, 955 F.2d 1479, 1491 (11th Cir. 1992), and *Vaughn v. Rosen*, 523 F.2d 1136, 173 U.S. App. D.C. 187 (D.C. Cir. 1975))

Notwithstanding this test, to the extent a government agency places its deliberations “at issue” in litigation, the agency waives such privilege. *Id.* at 3 (“[E]ven if a document is both ‘pre-decisional’ and ‘deliberative,’ the privilege will not apply when an agency places its deliberations at issue.”) citing *In re Methyl Tertiary Butyl Ether Prods. Liab. Litig.*, 898 F. Supp. 2d 603, 608 (S.D.N.Y. 2012); see also *Delphi Corp. v. United States*, 276 F.R.D. 81, 85 (S.D.N.Y. 2011) (“Where the deliberative or decisionmaking process is the ‘central issue’ in the case, the need for

the deliberative documents will outweigh the possibility that disclosure will inhibit future candid debate among agency decision-makers.”).

The State waived its right to assert the deliberative process privilege by placing its “deliberations” regarding the Washington Bridge, including its rehabilitation and/or replacement decision, at issue in this litigation. In *Wells Fargo*, the court determined that “. . . the privilege will not apply when an agency places its deliberations at issue.” *Id.* at 3.

*Wells Fargo* concerned a dispute in connection with the highly publicized 38 Studios litigation. *Id.* at 1, (citing *Rhode Island Econ. Dev. Corp. v. Wells Fargo Sec., LLC*, PB-12-5616, 2013 WL 4711306, at \*2 (R.I. Super. Aug. 28, 2013)) (“[t]he basic plot is well-known: 38 Studios, LLC (38 Studios) was induced to move its business to the Ocean State in exchange for a massive financial accommodation; less than two years later, 38 Studios went bankrupt. Much has been written about that plot in the media. Much has been discussed and debated—and continues to be discussed and debated—in the other two branches of government.”)

During discovery, defendants sought production of documents from multiple government offices: the Rhode Island Economic Development Corporation (“EDC”), the Office of the Governor, the Department of Administration (“DOA”), the Department of Revenue, and the General Treasurer’s Office. These offices asserted privileges, including the deliberative process privilege, over broad sets of documents identified in their privilege logs. *Id.*

The court’s ruling compelled production of the documents notwithstanding the claim of privilege. *Id.* at 3. It found:

To the extent that ***any privilege log claims*** the deliberative process privilege with respect to matters that were communicated to the EDC, or any member of the EDC Board, including, without limitation, the Governor, or staff of the Governor to the extent that the document was communicated to the Governor, ***the claim of privilege is inappropriate because it was the decision-making of the EDC that has been placed at issue in this case.*** Thus, whatever information the EDC or any member

of the EDC Board, including the Governor, or the Governor's staff to the extent that the document was communicated to the Governor, had is at the center of this case and the Defendants have demonstrated a need to know what the EDC and the EDC Board members were told.

*Id.* (emphasis added).

The court did not decide this privilege issue document-by-document. Instead, it addressed “any privilege log claims” meeting its criteria, finding all such claims inappropriate where deliberations were at issue. *Id.* On that basis, the court issued a global order compelling the government agencies to produce documents that were classified as privileged under the deliberative process privilege. *Id.* at 4.

The breadth of *Wells Fargo's* reasoning applies directly here. In the present case, the State's decades-long decision-making regarding the Washington Bridge is the center of its lawsuit:

- Communications and directives involving RIDOT leadership, the Governor's Office, DOA, the Federal Highway Administration (“FHWA”), and consulting engineers, reflecting coordination or lack of coordination on projects and safety determinations.
- Decisions to proceed with, delay, or alter rehabilitation and reconstruction projects, including the pivotal choice to rehabilitate the existing bridge rather than demolish and replace it.
- What the State knew and considered about the Bridge's structural condition, including inspection findings, engineering assessments, and risk reports that bear directly on the allegations against the JV.
- Approvals or rejections of state employee, contractor, and consultant recommendations, including whether the State accepted or ignored proposals that would have materially affected the bridge's safety, longevity, or closure timeline.
- Choices about the scope, method, and frequency of inspections, evaluations, and engineering studies, and what information the State elected to share with or withhold from the JV during the 2021 Design-Build project.
- Procurement processes for major projects on the Washington Bridge, including the State's decision to procure the 2021 Design-Build rehabilitation project using a prescriptive Basis of Technical Concepts (BTC) instead of an open design competition.

- Oversight, review, and response to inspection reports, structural assessments, and proposed repair plans, including how the State addressed findings of deficiencies or deterioration.

As in *Wells Fargo*, even if such documents and communications purportedly reflecting “deliberations” meet the two-prong deliberative process test, they have been placed “at the center of this case” and therefore any privilege is waived. *Id.* at 3. Accordingly, the State’s claim of deliberative process privilege is inappropriate, and the Court should similarly issue a broad order — not a piecemeal one — compelling full, unredacted production of all documents on which the State has asserted the deliberative process privilege, and barring the State from similar assertions for future productions.

## **II. THE STATE’S REDACTIONS CONFIRM ITS MISUSE OF THE DELIBERATIVE PROCESS PRIVILEGE**

The State’s own productions demonstrate that it is using the “deliberative process privilege” to obscure materials outside the privilege’s narrow scope. The JV’s October 3, 2025 deficiency letter (**Exhibit F**) identifies numerous examples, drawn directly from the State’s September 2 responses, where the asserted privilege hides routine, factual information that cannot conceivably meet either prong of the *Wells Fargo* test.

Representative examples include:

- **RIDOT\_000006168–RIDOT\_000006172** – Internal RIDOT email exchange dated less than two weeks after the State’s emergency closure of the Washington Bridge, with the subject line “Washington Street Bridge – Proposed Monitoring and Testing Locations.”
- **RIDOT\_000007958–RIDOT\_000007961** – Internal RIDOT email exchange discussing a Change Order directly related to the JV’s rehabilitation contract — the very contract on which the State bases its claims against the JV in this litigation.
- **RIDOT\_000010411–RIDOT\_000010413** – Internal RIDOT email forwarding a Providence Journal news article, sent to RIDOT by a Political/State House Reporter, bearing the subject “Cardi?” and dated approximately one month after the State’s emergency closure of the Washington Bridge.

Setting aside the “at-issue” nature of these documents and communications, the State’s redactions fail because they do not satisfy the legal test for the deliberative process privilege. As shown in the examples above, the withheld material is factual in nature. These documents or communications do not appear to have been prepared specifically to assist the State in arriving at a decision. Nor do they convey recommendations or opinions on legal or policy matters. They therefore cannot be considered “deliberative”. *Wells Fargo*, 2014 WL 3407982, at 2–3.

These examples illustrate that the State has been applying the privilege far beyond its relevant application. The Court should order the State to remove all “deliberative process” redactions from currently produced documents and from any future productions.

### **III. THE STATE’S “NON-RESPONSIVE” DESIGNATIONS ARE IMPROPER AND CANNOT JUSTIFY REDACTIONS**

The State continues to assert non-responsiveness as a basis for redacting documents. (**Exhibit E**). These non-responsive assertions are not claims of privilege and therefore provide no basis to redact documents. *State v. Lead Indus. Ass'n, Inc.*, 64 A.3d 1183, 1198 (R.I. 2013) (“[N]onresponsive documents are not required to be reported in a privilege log.”). The State’s non-responsive designations also call into question the State’s broader determinations of “responsiveness” in discovery. Moreover, a document cannot be withheld from production simply because some portion of a responsive document may contain non-responsive material. In that case, the document must be produced in full.

The State’s misuse of this designation is illustrated by representative examples from the November 17 log:

- **RIDOT\_000049285** — completely redacted, despite following a document titled “Washington Bridge North No. 700 Rehabilitation Acceleration Analysis.”

- **RIDOT\_000049331** — partially redacted meeting minutes from a prior State-procured rehabilitation construction project involving Cardi Corporation. The State later abandoned that project.
- **RIDOT\_000049440** — relating to the same prior Cardi/State rehabilitation contract, and generated in the context of a Change Order request, yet partially redacted.

None of these documents are privileged; they relate directly to subject matter at the heart of this litigation and, at a minimum, contain factual information to which the JV is entitled. Accordingly, the Court should order the State to remove all non-responsive redactions from its productions. In addition, the Court should bar the State from using “non-responsive” as either a log designation or a redaction basis in any future productions.

### CONCLUSION

For the reasons set forth throughout this Motion, the State’s assertion of the deliberative process privilege and its reliance on non-responsive designations as a basis for privilege are improper. The State has (1) waived the deliberative privilege by placing its deliberations at issue in this case; (2) applied it to redact purely factual materials that cannot satisfy the two-prong test under Rhode Island law; and (3) improperly designated documents as non-responsive to claim privilege and justify redactions, including of materials plainly related to the core issues in this litigation. By producing responsive documents with sweeping deliberative process and non-responsive redactions, the State is blocking the JV’s access to evidence critical to preparing and supporting its claims and defenses.

The JV respectfully requests that the Court overrule the State’s deliberative process objections and compel the State to produce, in full and without redactions, all documents currently redacted on that basis. The JV further requests that the Court order the State to remove all

non-responsive redactions and prohibit the use of non-responsive as a privilege designation. Finally, the JV asks that the Court's order apply prospectively to all future productions, ensuring complete disclosure of responsive materials and eliminating the need for repeated motion practice on these same issues.

Dated: December 12, 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](mailto: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](mailto: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](mailto:chris.mellado@foley.com)

*Admitted Pro Hac Vice*

Matthew Kass (WB #1121980)  
777 E. Wisconsin Avenue  
Milwaukee, WI 53202

[mkass@foley.com](mailto: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](mailto: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 #8396  
128 Dorrance Street, Suite 300  
Providence, Rhode Island 02903  
[jparmenter@ksprlaw.com](mailto: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 on the 12th day of December, 2025, I electronically filed and served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Jeffrey B. Pine



# EXHIBIT A

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-2024-04526  
***Business Calendar***

**PLAINTIFF'S RESPONSE TO DEFENDANT BARLETTA/AETNA I-195  
WASHINGTON BRIDGE PHASE 2 JV'S FIRST REQUEST TO PRODUCE  
DATED JUNE 13, 2025**

Pursuant to Rule 34 of the Superior Court Rule of Civil Procedure, now comes the Plaintiff, State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following Responses to Defendant, Barletta/Aetna I-195 Washington Bridge North Phase 2 JV's First Request to Produce dated June 13, 2025:

1. All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's determination to issue the 2021 RFP for rehabilitation of the WASHINGTON BRIDGE instead of a demolition and replacement project.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 2

**Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

2.All DOCUMENTS provided to DESIGN-BUILD PROPOSERS for the 2021 RFP.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000021552- RIDOT\_000021841. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

3.All DOCUMENTS and COMMUNICATIONS RELATED TO the BTC and the post-tensioning system or Piers 6 and 7 of the WASHINGTON BRIDGE.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_41-83; 475-482;516-522;548-556;564-583;800-802;915-920;1012-1015;1044-1048;1074-1077;1447-1478;2483-2487;3777-3789;3785-3787;4290-4296;4325-4326;4334-4344;4384-4385;4393-4394;4399-4412;4438-4447;4452-4467;4470-4473;4510-4514;4625-4633;4637-4646;4905-4906;4926-4927;4997-5026;5035-5061;5078-5088;5093-5109;5123;5218-5219;5243-5258;5261-5263;5266-5301;5407-5408;5597;5638-5639;5791-5792;5801-5802;5807-5810;5827-5836;5841-5848;5851-5871;5874-5894;5905;5964-5967;6012-6021;6030-6031;6115-6119;6134-6135;6140;6142-6144;6164-**

*Cohen Milstein Sellers & Toll, PLLC  
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408  
Telephone: 561.515.1400 Facsimile: 561.515.1401*

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 3

6165;6168-6182;6185-6189;;6238-6247;6261-6262;6290-6295;6300-6311;6313-6315;6319-6320;6331-6335;6349-6381-6391;6396-6487;6492-6533;6553-6603;6616-6650;6663-6701;6723-6754;6758-6763;6773-6807;6824-6862;6872-6910;6919-6953;6956-6990;7002-7039;7050-7087;7099-7139;7142-7224;7236-7269;7281-7318;7329-7366;7378-7413;7425-7459;7471-7506;7518-7555;7574-7606;7621-7654;7707;9529-9530;9534-9549;9556-9573;9577-9595;9598-9600;9646-9661;9711-9712;9714-9719;9722-9740;9745-9747;9749-9777;9781-9796;9888-9892;9896-9911;9922-9931;10013-10014;10022-10029;10032-10052;10055-10075;10099;10103;10107-10116;10184-10186;10202-10205;10208-10211;10216-10218;10246-10274;10278-10336;10348-10367;10372-10374;10408-10409;10418-10422;10437;10483-10528;10700-10750;10753-10790;10801-10838;10840-10843;10846-10888;10893-10934;10943-10958;10968-10985;10989-11003;11033-11037;11042-11046;11048-11057;11059-11069;11103-11158;11199-11202;11205-11208;11212-11223;11225-11228;11255-11259;11267-11286;11819-11858;21552-21841;1677-4344;4383;4393-4394;4399-4419. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

4.All COMMUNICATIONS between or among RIDOT and any DESIGN-BUILD PROPOSERS for the PROJECT.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_6284-6287;7954-7967;7998-8002;8459;8750;8752-8753;8756;8759;8763;8766;8785;9323-9336. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 4

5.All design-build proposals submitted in response to the 2021 RFP.

**RESPONSE:** See previously produced BATES: 14963-15182; 15186-15308;15315-15495;15501-15706;15713-16063;16070-16706;16713-17287;17294-17725;17733-17779;17787-18082;18090-18746;18754-19148;19156-19305;19557-21384;21400-22353. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

6.All DOCUMENTS RELATED TO RIDOT's score or evaluation of design-build proposals for the PROJECT.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

7.All DOCUMENTS AND COMMUNICATIONS RELATED TO sources of funds available to procure the PROJECT.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000049853-RIDOT\_000049920Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

8.A copy of RIDOT's risk matrix RELATED TO the 2021 DESIGN-BUILD CONTRACT.

**RESPONSE:** Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 5

9.A copy of the 2021 DESIGN-BUILD CONTRACT.

**RESPONSE: See previously produced BATES 21448-21551.**

10.All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's review, approval, or concurrence with the JV's WASHINGTON BRIDGE rehabilitation plans, including, but not limited to, comment resolution forms, RIDOT transmittals, and certificates of compliance.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced folder labeled Bareletta/AETNA. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

11.All meeting minutes RELATED TO the PROJECT.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES 32330-32342;32350-32499;41061-41075;41450-41464;41997-42000;42730-42733;42735-42739;42741-42745;42747-42790;42792-42795;42797-42801;42803-42807;42809-42813;42815-42819;42875-42892;42905-42959;42979-42988;43007-43011;43022-43023;43087-43066;43105-43106;43453-43454;44424-44428;42973-42977;44429-44438;44445-44446;45330-45418;45419-45449. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 6

12.All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR  
allegations in the AMENDED COMPLAINT ¶¶ 34-39.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES in response to RTP 35. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

13.All DOCUMENTS and COMMUNICATIONS RELATED TO  
the LICHTENSTEIN REPORT.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES in response to RTP 35. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

14.All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR  
allegations in the AMENDED COMPLAINT ¶ 91.

**RESPONSE:** Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discover

15.All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR  
allegations in the AMENDED COMPLAINT ¶¶ 92-95.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES: 4279;4515-4528;4656-4662;4736-4742;45233-5239;5266-5301;5763;6032-6045;

*Cohen Milstein Sellers & Toll, PLLC*  
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408  
Telephone: 561.515.1400 Facsimile: 561.515.1401



Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 7

**7672-7673;8942;9312-9313;11041-11046;11048-11057;40274-40729;40839-40851;41536-41548;41680-41681;41714. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

16.All DOCUMENTS and COMMUNICATIONS RELATED TO YOUR allegations in the AMENDED COMPLAINT ¶¶ 103-106.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES 49738-49852. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

17.All organizational charts, procedures, instructions, or guidelines that RELATE TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

18.All COMMUNICATIONS with the Federal Highway Administration RELATING TO the WASHINGTON BRIDGE after January 1, 2021.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work



Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 8

**product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES 000000001-000014491. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

19.All COMMUNICATIONS with Wiss, Janney, Elstner Associates, Inc. RELATED TO the WASHINGTON BRIDGE after December 11, 2023.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

20.All COMMUNICATIONS with McNary Bergeron & Johannesen, LLC RELATED TO the WASHINGTON BRIDGE after December 11, 2023.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

21.All COMMUNICATIONS between or among Peter Alviti, Jr., P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege,**

*Cohen Milstein Sellers & Toll, PLLC  
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408  
Telephone: 561.515.1400 Facsimile: 561.515.1401*

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 9

**the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

22.All COMMUNICATIONS between or among Loren Doyle and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

23.All COMMUNICATIONS between or among Lori Fisetle and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

24.All COMMUNICATIONS between or among Robert Rocchio, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 10

25.All COMMUNICATIONS between or among John Preiss, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

26.All COMMUNICATIONS between or among Anthony Pompei, P.E. and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

27.All COMMUNICATIONS between or among Dawn Cruz and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after January 1, 2021.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

28.All COMMUNICATIONS between or among RIDOT and any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE after December 11, 2023

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 11

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

29.All work authorizations, contracts, or agreements entered into by RIDOT with any PERSON RELATED TO the design, construction, maintenance, or assessment of the WASHINGTON BRIDGE.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

30.All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's determination to demolish and replace the WASHINGTON BRIDGE.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

*Cohen Milstein Sellers & Toll, PLLC  
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408  
Telephone: 561.515.1400 Facsimile: 561.515.1401*

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 12

31.All inspection and maintenance DOCUMENTS RELATED TO the WASHINGTON BRIDGE, including, but not limited to, logs, 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 daily time sheets.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES 1909;2310-2315;2797-2966;4370-4382;5137-5148;5160-5172;5197-5206;5266-5301;5440-5450;5462-5471;5483-5493;5976-5985;6101-6113;6347-6394;6392-6443;6488-6490;6534-6538;6614;665106661;6705-6710;6721;6764-6771;6808-6822;6863-6870;6911-6917;6954;6991-6999;7000-7048;7088;7089-7097;7135;7140;7179-7187;7225-7234;7270-7279;7319-7327;7367-7376;7414-7423;7460-7469;7507-7516;7556-7563;7972-7982;8312-8317;9520;10236;10244;10300;10337;10338-10345;10450;10602;10751;10791-10798;10844;10889-10891;10935-10939;11103-11158;11211;11229-11237;11736-11738;13139-13157;13171-13175;13192-13196;14361-14396;14919-14920;14961. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

32.All DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's financial records or budgets for inspections of the WASHINGTON BRIDGE.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES 1860;3574-3595;4279;6001-6003;6152-6157;7728-7729;7731-7770;7785-7786;7906-7907;7918-7949;7951-7952;8746-8747;8795-8796;8860-8875;8883-8884;8897-8914;8957-8958;8971-9020;11042-11057;11342-11363;11364-11514;11750-11753;12861-12864;14496-14497;14660;14726;14754-14757. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

*Cohen Milstein Sellers & Toll, PLLC*  
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408  
Telephone: 561.515.1400 Facsimile: 561.515.1401



Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 13

33.All DOCUMENTS and COMMUNICATIONS RELATED TO the inspection costs of the WASHINGTON BRIDGE incurred by RIDOT after December 11, 2023.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts. Subject to those objections, and without waiving the same, see previously produced BATES 32276-33006. Discovery is ongoing and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

34.All photographs or videos of the WASHINGTON BRIDGE.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 14

Respectfully Submitted,  
Plaintiff,  
State of Rhode Island,  
By its Attorneys,

/s/ Stephen N. Provazza

Sarah W. Rice, Esq. (#10588)  
Stephen N. Provazza, Esq. (#10435)  
Assistant Attorneys General  
Rhode Island Office of the Attorney General  
150 S. Main Street  
Providence, RI 02903  
Tel: (401) 274-4400  
[srice@riag.ri.gov](mailto:srice@riag.ri.gov)  
[sprovazza@riag.ri.gov](mailto:sprovazza@riag.ri.gov)

/s/ Theodore J. Leopold

Theodore J. Leopold (admitted *pro hac vice*)  
Leslie M. Kroeger (admitted *pro hac vice*)  
Diana L. Martin (admitted *pro hac vice*)  
Poorad Razavi (admitted *pro hac vice*)  
Takisha Richardson (admitted *pro hac vice*)  
Adnan Toric (admitted *pro hac vice*)  
Cohen Milstein  
11780 U.S. Highway One  
Suite N500  
Palm Beach Gardens, FL 33408  
[tleopold@cohenmilstein.com](mailto:t Leopold@cohenmilstein.com)  
[lkroeger@cohenmilstein.com](mailto:lkroeger@cohenmilstein.com)  
[dmartin@cohenmilstein.com](mailto:dmartin@cohenmilstein.com)  
[prazavi@cohenmilstein.com](mailto:prazavi@cohenmilstein.com)  
[trichardson@cohenmilstein.com](mailto:trichardson@cohenmilstein.com)  
[atoric@cohenmilstein.com](mailto:atoric@cohenmilstein.com)

Rhode Island Washington Bridge; 30115.001  
Case No.: PC-2024-04526

Page 15

/s/ Jonathan N. Savage

Jonathan N. Savage, Esq. (#3081)

Michael P. Robinson, Esq. (#6306)

Edward D. Pare III, Esq. (#9698)

Savage Law Partners, LLP

564 South Water Street

Providence, RI 02903

Tel: (401) 238-8500

Fax: (401) 648-6748

[js@savagelawpartners.com](mailto:js@savagelawpartners.com)

[mrobinson@savagelawpartners.com](mailto:mrobinson@savagelawpartners.com)

[epare@savagelawpartners.com](mailto:epare@savagelawpartners.com)

### **CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of September 2025, I electronically served this document through the electronic filing system on counsel of record. The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Edward D. Pare III



# EXHIBIT B

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-2024-04526  
***Business Calendar***

**PLAINTIFF'S RESPONSE TO DEFENDANT BARLETTA/AETNA I-195  
WASHINGTON BRIDGE NORTH PHASE 2 JV'S SECOND REQUEST TO PRODUCE  
DATED JUNE 20, 2025**

Pursuant to Rule 34 of the Superior Court Rule of Civil Procedure, now comes the Plaintiff, State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following Responses to Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV's Second Request to Produce dated June 20, 2025:

35. All COMMUNICATIONS between or among RIDOT and LICHTENSTEIN RELATED TO radiographic, ultrasonic shear wave tomography, or ground penetrating radar testing of the WASHINGTON BRIDGE.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court**

**Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000012781-000012839; 000014963-RIDOT\_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

36. All DOCUMENTS RELATED TO RIDOT's solicitation of BID # 7461338.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000014963- RIDOT\_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

37. All DOCUMENTS RELATED TO RIDOT's evaluation of the proposals in response to the BID # 7461338 and all award decision-RELATED DOCUMENTS.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000014963- RIDOT\_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

38. All Letters of Interest / Technical Proposals (LOI/TECH) in response to BID

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000014963-RIDOT\_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

39. All DOCUMENTS RELATED TO the TECHNICAL SELECTION CRITERIA for BID # 7461338.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000014963- RIDOT\_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

40. All DOCUMENTS RELATED TO the TEC's "Final Selection" recommendation for BID # 7461338.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000014963- RIDOT\_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

41. All DOCUMENTS and COMMUNICATIONS between or among the TEC RELATING TO BID # 7461338.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000014963- RIDOT\_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

42. All COMMUNICATIONS between or among the TEC and respective proposers for BID # 7461338.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000014963- RIDOT\_000018082. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

43. A copy of the National Bridge Inspection Standards ("NBIS"), inspection report, for the WASHINGTON BRIDGE, from NBIS's inspection performed on or about August 3, 2011.

**RESPONSE:** See BATES RIDOT\_000049921-RIDOT\_000050804 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

44. A copy of Michael Baker International, Inc.'s Bridge Load Rating report for the WASHINGTON BRIDGE, dated July 10, 2012, and revised September 13, 2012.

**RESPONSE: See BATES See BATES RIDOT\_000049921-RIDOT\_000050804 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

45. A copy of Michael Baker International, Inc.'s Bridge Load Rating report for the WASHINGTON BRIDGE, dated July 10, 2012, as revised August 10, 2012, and September 13, 2012.

**RESPONSE: See BATES See BATES RIDOT\_000049921-RIDOT\_000050804 produced contemporaneously with this Response. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

46. All DOCUMENTS RELATING TO RIDOT's condition assessment of the WASHINGTON BRIDGE, which led to or contributed to RIDOT's decision to rehabilitate the bridge through issuance of the 2021 RFP.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

47. All internal DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's decision to rehabilitate the WASHINGTON BRIDGE, including risk assessments, engineering evaluations, and cost-benefit analyses.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

48. All internal DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's decision to demolish the WASHINGTON BRIDGE, including risk assessments, engineering evaluations, and cost-benefit analyses.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

49. All internal DOCUMENTS and COMMUNICATIONS RELATED TO RIDOT's decision to rebuild the WASHINGTON BRIDGE, including risk assessments, engineering evaluations, and cost-benefit analyses.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing,



**and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

50. All reports prepared or for the STATE, RIDOT, or any agency of the STATE, whether in draft or final form and all appendices thereto, RELATED TO the WASHINGTON BRIDGE, including, without limitations, any forensic analysis report WJE prepared in 2024.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.**

51. All DOCUMENTS and COMMUNICATIONS in your possession, custody, or control RELATING TO WJE and the WASHINGTON BRIDGE.

**RESPONSE: The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure.**



52. All DOCUMENTS and COMMUNICATIONS RELATIONG TO the STATE and/or RIDOT's plan and decision to demolish and replace the WASHINGTON BRIDGE, including any and all DOCUMENTS and COMMUNICATIONS considering other options. The relevant time frame for this request is January 1, 1990 to present.

**RESPONSE:** The Plaintiff objects to this Request because it seeks documents, communications, and/or information that is or may be protected from disclosure by the attorney-client privilege, the deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to those objections, and without waiving the same, see previously produced BATES RIDOT\_000000001- RIDOT\_000049852. Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery.

Plaintiff,  
State of Rhode Island,  
By its Attorneys,

/s/ Stephen N. Provazza

Sarah W. Rice, Esq. (#10588)  
Stephen N. Provazza, Esq. (#10435)  
Assistant Attorneys General  
Rhode Island Office of the Attorney General  
150 S. Main Street  
Providence, RI 02903  
Tel: (401) 274-4400  
[srice@riag.ri.gov](mailto:srice@riag.ri.gov)  
[sprovazza@riag.ri.gov](mailto:sprovazza@riag.ri.gov)

/s/ Theodore J. Leopold

Theodore J. Leopold (admitted *pro hac vice*)  
Leslie M. Kroeger (admitted *pro hac vice*)  
Diana L. Martin (admitted *pro hac vice*)  
Poorad Razavi (admitted *pro hac vice*)  
Takisha Richardson (admitted *pro hac vice*)  
Adnan Toric (admitted *pro hac vice*)  
Cohen Milstein  
11780 U.S. Highway One, Suite N500  
Palm Beach Gardens, FL 33408  
[tleopold@cohenmilstein.com](mailto:t Leopold@cohenmilstein.com)  
[lkroeger@cohenmilstein.com](mailto:lkroeger@cohenmilstein.com)  
[dmartin@cohenmilstein.com](mailto:dmartin@cohenmilstein.com)  
[prazavi@cohenmilstein.com](mailto:prazavi@cohenmilstein.com)  
[trichardson@cohenmilstein.com](mailto:trichardson@cohenmilstein.com)  
[atoric@cohenmilstein.com](mailto:atoric@cohenmilstein.com)

/s/ Jonathan N. Savage

Jonathan N. Savage, Esq. (#3081)  
Michael P. Robinson, Esq. (#6306)  
Edward D. Pare III, Esq. (#9698)  
Savage Law Partners, LLP  
564 South Water Street  
Providence, RI 02903  
Tel: (401) 238-8500  
Fax: (401) 648-6748  
[js@savagelawpartners.com](mailto:js@savagelawpartners.com)  
[mrobinson@savagelawpartners.com](mailto:mrobinson@savagelawpartners.com)  
[epare@savagelawpartners.com](mailto:epare@savagelawpartners.com)

Cohen Milstein Sellers & Toll, PLLC  
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408  
Telephone: 561.515.1400 Facsimile: 561.515.1401

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of September 2025, I electronically served this document through the electronic filing system on counsel of record. The document electronically served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Edward D. Pare III

# EXHIBIT C

DATE & TIME	RECORD TYPE	AUTHOR	RECIPIENT	COPYEES	SUBJECT MATTER	PRIVILEGE	BATE NUMBERS
8/5/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer J. Pilkington, Asst. Chief/Const. Operations Jobsite	Correspondence between ATENA and RIDOT	Deliberative Process	RIDOT_000000585- RIDOT_000000589
3/30/1988	Correspondence	Paul R. Annaummo, P.E. - Managing Engineer	Wendall J. Flanders - Chief Engineer	Capaldi, Parker, Annarummo, Corrao, DeAngelis, Pilkington, Carter	Inter-Office Memo	Deliberative Process	RIDOT_000000817-RIDOT_000000819
3/5/1998	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	W. Flanders, PR, Chief Engineer- Construction J. Pilkington, Asst. Chief/Construction Operation Jobsite	Correspondence between ATENA and RIDOT	Deliberative Process	RIDOT_000000855-RIDOT_000000856
5/6/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer J. Pilkington, Asst. Chief/Const. Operations Jobsite	Correspondence between ATENA and RIDOT	Deliberative Process - Personal Information	RIDOT_000001035, RIDOT_000001038, RIDOT_0001040, RIDOT_000001042
1/6/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	W. Flanders, PR, Chief Engineer- Construction J. Pilkington, Asst. Chief/Construction Operation Jobsite J. Pursche, CFO	Correspondence between ATENA and RIDOT	Personal Information	RIDOT_000001081, RIDOT_000001083
10/8/1996	Correspondence	Phillip Kydd- Administrator	Joan Martel - EEO Officer- Aetna Bridge	J. Capaldi - Construction Operations L. Boisclair (R.E.), P. DeSimone (R.E.) E.Colantuono (R.E.) SER- Jobs for Progress, J. Marcello (Tilcon Gammino)	Correspondence between RIDOT and AETNA	Non-Responsive Materials	RIDOT_000001290-RIDOT_000001292
4/22/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite J. Pursche, CFO	Correspondence between RIDOT and AETNA	Personal Information	RIDOT_000001326, RIDOT_000001329, RIDOT_000001333, RIDOT_000001334
2/20/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite J. Pursche, CFO	Correspondence between RIDOT and AETNA	Work Product - Deliberative process	RIDOT_000001336-RIDOT_000001338
6/24/1996	Correspondence	Serafin Evora- EEO Compliance Officer- RIDOT	Joan Martel - EEO Officer- Aetna Bridge	J. McGee, J. Capaldi, C. Cherry, P. DeSimone (R.E.)	Correspondence between ATENA and RIDOT	Work Product - Deliberative process	RIDOT_000001411-RIDOT_000001414
6/5/1996	Correspondence	Jeffrey A. Bostock - AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite	Correspondence between ATENA and RIDOT	Deliberative Process	RIDOT_000001431-RIDOT_000001435
4/11/1998	Timesheet	Joan Martel- AETNA Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001539-RIDOT_000001542
12/13/1997	Timesheet	Linda M Duffy - AETNA Bridge- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001543-RIDOT_000001544
9/13/1997	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001545-RIDOT_000001548
4/12/1997	Timesheet	Joan Martel - Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001549-RIDOT_000001552
4/5/1997	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001553-RIDOT_000001556
11/30/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001558-RIDOT_000001651
11/9/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001562-RIDOT_000001566
11/16/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001567-RIDOT_000001571
10/26/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001577-RIDOT_000001581
6/22/1996	Timesheet	Linda M Duffy- Aetna Bridge Company- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001582-RIDOT_000001587

DATE & TIME	RECORD TYPE	AUTHOR	RECIPIENT	COPYEES	SUBJECT MATTER	PRIVILEGE	BATE NUMBERS
5/11/1996	Timesheet	Linda M Duffy- Aetna Bridge Company- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001588-RIDOT_000001589
4/13/1996	Timesheet	Linda M Duffy - AETNA Bridge- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001590-RIDOT_000001591
11/20/2023	Correspondence	Barietta-Atena I-195 Washington Bridge North Phase 2 JV	RIDOT	None	Invoicing hours for the month of November 2023.	Deliberative Process	RIDOT_000002310-RIDOT_000002315
8/16/2023	Daily Activity Report	RIDOT- James Twomey	RIDOT	None	Daily Activity Log	Deliberative Process	RIDOT_000003165-RIDOT_000003169
3/8/2023	Correspondence	RIDOT	Barietta/Aetna Washington Bridge Phase 2 JV	None	Project Status Meeting- Meeting Agenda	Deliberative Process	RIDOT_000003424-RIDOT_000003427
2/9/2024	Email	RIDOT- Anthony Pompei	Lori Fisette, Loren Doyle	Steven Soderlund	Internal Office Emails	Deliberative Process	RIDOT_000004288-RIDOT_000004289
4/20/2017	Email	Kristen Capaldi	Anthony Pomepi	None	Internal Office Emails	Deliberative Process	RIDOT_000004388-RIDOT_000004389
12/16/2023	Email	Anthony Palombo	Keith Gaulin	John Preiss	Internal Office Emails	Deliberative Process	RIDOT_000004816-RIDOT_000004822
12/16/2023	Email	Anthony Rotondo	Keith Gaulin, Carlos Padilla	John Preiss, Anthony Pompei, Anthony Palombo	Internal Office Emails	Deliberative Process	RIDOT_000004968-RIDOT_000004974
12/13/2023	Email	Paul McGuinness - Mbaker	Marc D'Amore, Keith Gaulin	Anthony Pompei, John Preiss	Internal Office Emails	Deliberative Process	RIDOT_000005233-RIDOT_000005239
12/14/2023	Email	Keith Gaulin	Anthony Pomepi, John Preissm Corey Richard, Anthony Rotondo	Kristina Hanes, Joseph Allwarden, Dave Fish, Steven Soderlund	Internal Office Emails	Deliberative Process	RIDOT_000005541-RIDOT_000005543
11/3/2017	Email	Robert Rocchio	Peter Alviti Jr, Shoshana Lew, David Fish, Loren Doyle	Georgette Chahine, Kieth Gaulin, David Cluley	Internal Office Emails	Work Product	RIDOT_000005764-RIDOT_000005765
12/20/2023	Email	Mary Vittoria Bertrand	Keith Gaulin	None	Internal Office Emails	Deliberative Process	RIDOT_000006168-RIDOT_000006172
4/25/2017	Email	Kristen Capaldi	Paul DelCioppio	None	Internal Office Emails	Deliberative Process	RIDOT_000006336-RIDOT_000006338
Unknown Date	Text Message		Pam Cotter, Liz P. Lori Fisette, John Igliozzi, Director Alviti, 401-527-7385	None	Text Messages between RIDOT Employees and Counsel for RIDOT	Attorney Client Privilege	RIDOT_000007661
1/18/????	Text Message		Pam Cotter, Liz P. Lori Fisette, John Igliozzi, Director Alviti, 401-527-7385, Bob Rocchio, Steven Pristawa	None	Text Messages between RIDOT Employees and Counsel for RIDOT	Attorney Client Privilege	RIDOT_000007662
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007717-RIDOT_000007723
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007777
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007778-RIDOT_000007784
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007804-RIDOT_000007815
10/11/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007822-RIDOT_000007828

DATE & TIME	RECORD TYPE	AUTHOR	RECIPIENT	COPYEES	SUBJECT MATTER	PRIVILEGE	BATE NUMBERS
2/9/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007829-RIDOT_000007834
9/9/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007835-RIDOT_000007841
5/24/2023	Email	Anthony Pompei	David Raposa, Gentry Andrews	Louis Maccarone, Steven Soderlund	Internal Office Emails	Deliberative Process	RIDOT_000007958-RIDOT_000007961
9/13/2022	Email	Anthony Palombo	Anastasia Wachter	Loren Doyle, Linda Burke, Lori Fisette, Carlos Padilla, Brett Campos, Jim Primeau, James McGinn, Anthony Pompei, Louis Maccarone	Internal Office Emails	Non-Responsive Materials	RIDOT_000008661-RIDOT_000008867
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008876-RIDOT_000008882
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008885-RIDOT_000008890
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non- Responsive Materials	RIDOT_000008915-RIDOT_000008921
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008922-RIDOT_000008928
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008929-RIDOT_000008940
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_0000089143-RIDOT_000008949
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008950-RIDOT_000008956
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008959-RIDOT_000008970



DATE & TIME	RECORD TYPE	AUTHOR	RECIPIENT	COPYEES	SUBJECT MATTER	PRIVILEGE	BATE NUMBERS
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008995-RIDOT_000009001
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000009006-RIDOT_000009017
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000009181-RIDOT_000009187
1/27/2024	Email	Lisbeth Pettengill	Andrea R Palagi, Charles St. Martin III	Matthew Sheaff, Olivia Darocha	Internal Office Emails	Deliberative Process	RIDOT_000010411-RIDOT_000010413
12/15/2023	Correspondence	Elizabeth Correria - Senior Historic Preservation Specialist	Devon Kurtz, Executive Director, Blackstone Heritage Corridor, inc.	Begin, Byrne, Correia, Fahey, Palumbo, Soderlund	Data Sheet	Deliberative Process	RIDOT_000011044-RIDOT_000011046
2/8/2019	Correspondence	AECOM	RIDOT	None	Invoices from AECOM	Deliberative Process	RIDOT_000011423-RIDOT_000011433
12/15/2006	Correspondence	RIDOT	RIDOT	None	RFI Tracking Sheet	Deliberative Process	RIDOT_000014361
12/12/1997	Correspondence	Paul M. Jordan, P.E. Senior Project Manager- VHB	Kazem Farhoumand, P.E. Managing Engineer, Bridge Design	Dennis Ledo- RIDOT	VHB Correspondence to RIDOT	Deliberative Process	RIDOT_000014418
10/13/2010	Correspondence	Peter A. Healey, P.E. - Acting Chief Civil Engineer	Jean Boyle, Director, Department of Planning	Smith, Palumbo, Fish, Healey, Pavia, Gagnon, Hebert, Simpson, Emidy	Correspondence between RIDOT and Providence Preservation Society	Deliberative Process	RIDOT_000014456-000014459
11/25/1996	Correspondence	Dennis Ledo	Kazem Farhoumand, P.E. Managing Engineer, Bridge Design	Mr. Farhoumand	Letter of Transmittal	Deliberative Process	RIDOT_000014564
11/7/1195	Correspondence	Dennis Ledo	Kazem Farhoumand, P.E. Managing Engineer, Bridge Design	Mr. Farhoumand	Letter of Transmittal	Deliberative Process	RIDOT_000014631
11/3/1995	Correspondence	Edmund T. Parker, Jr., P.E.	David A. Ferguson	Parker, Bennett, Smith, Farhoumand, Faraj, Consultant (Paul Jordan)	Advance Work Authorization	Deliberative Process	RIDOT_000014660
10/3/1995	Correspondence	Dennis Ledo	Internal RIDOT- Unknown	None	Bridge Routing Slip	Deliberative Process	RIDOT_000014695, RIDOT_000014697
12/1/1995	Correspondence	Gilbert Pemberton, II	Paul M. Jordan, P.E.	K. Farhoumand- RIDOT, B. Patel- VHB, S.D. Morgan-NYNEX, J.A. Scungionom Jr. - RIDOT,	Letter of Transmittal	Deliberative Process	RIDOT_000014699- RIDOT_000014700
3/13/1996	Correspondence	Internal RIDOT- Unknown	Internal RIDOT- Unknown	None	Handwritten Note	Deliberative Process	RIDOT_000014733
2/5/1996	Correspondence	William F. Bundy, Leo Cirello, James R. Capaldi, P.E.	Gordon G. Hoxie	Messrs, Bundy, Capaldi, Parker, Bennett, Farhoumand, Annarummo, Sasso, Jackson, DelVecchio, Cirello, Alves, Scungio, Kydd, Prata,Mses, Hollands, Picard		Deliberative Process	RIDOT_000014754, RIDOT_000014756
2/6/1996	Correspondence	Paul M. Jordan, P.E. Senior Project Manager- VHB	Paul Annarummo, P.E.	Kazem Farhoumand	Internal Handwritten Notes	Deliberative Process	RIDOT_000014759-RIDOT_000014761
7/12/1993	Correspondence	The Commonwealth	RIDOT		Bridge Analysis and Rating	Deliberative Process	RIDOT_000014865-RIDOT_000014880

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DATE & TIME	RECORD TYPE	AUTHOR	RECIPIENT	COPYEES	SUBJECT MATTER	PRIVILEGE	BATE NUMBERS
8/5/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer J. Pilkington, Asst. Chief/Const. Operations Jobsite	Correspondence between ATENA and RIDOT	Non-Responsive Material	RIDOT_00000585- RIDOT_00000589
3/30/1988	Correspondence	Paul R. Annaummo, P.E. - Managing Engineer	Wendall J. Flanders - Chief Engineer	Capaldi, Parker, Annanummo, Corrao, DeAngelis, Pilkington, Carter	Inter-Office Memo	Non-Responsive Material - Deliberative Process	RIDOT_000000817- RIDOT_000000819
3/5/1998	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	W. Flanders, PR, Chief Engineer- Construction Pilkington, Asst. Chief/Construction Operation Jobsite	J. Correspondence between ATENA and RIDOT	Deliberative Process	RIDOT_000000855- RIDOT_000000856
5/6/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer J. Pilkington, Asst. Chief/Const. Operations Jobsite	Correspondence between ATENA and RIDOT	Deliberative Process - Personal Information	RIDOT_000001035- RIDOT_000001038- RIDOT_00 0001040, RIDOT_000001042
1/6/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	W. Flanders, PR, Chief Engineer- Construction Pilkington, Asst. Chief/Construction Operation Jobsite	J. Correspondence between ATENA and RIDOT	Personal Information	RIDOT_000001081, RIDOT_000001083
10/8/1996	Correspondence	Phillip Kydd- Administrator	Joan Martel - EEO Officer- Aetna Bridge	J. Capaldi - Construction Operations L. Boisclair (R.E.), P. DeSimone (R.E.) E. Colantuono (R.E.) SER- jobs for Progress, J. Marcello (Ticon Gammino)	Correspondence between RIDOT and AETNA	Non-Responsive Materials	RIDOT_000001290- RIDOT_000001292
4/22/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite	Correspondence between RIDOT and AETNA	Personal Information	RIDOT_000001326, RIDOT_000001329- RIDOT_000001333, RIDOT_000001334
2/20/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite	Correspondence between RIDOT and AETNA	Work Product - Deliberative process	RIDOT_000001336- RIDOT_000001338
6/24/1996	Correspondence	Serafin Evora- EEO Compliance Officer- RIDOT	Joan Martel - EEO Officer- Aetna Bridge	J. McGee, J. Capaldi, C. Cherry, P. DeSimone (R.E.)	Correspondence between ATENA and RIDOT	Work Product - Deliberative process	RIDOT_000001411- RIDOT_000001414
6/5/1996	Correspondence	Jeffrey A. Bostock - AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite	Correspondence between ATENA and RIDOT	Non-Responsive Materials Deliberative Process	RIDOT_000001431- RIDOT_000001435
4/11/1998	Timesheet	Joan Martel- AETNA Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001539- RIDOT_000001542
12/13/1997	Timesheet	Linda M Duffy - AETNA Bridge- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001543- RIDOT_000001544
9/13/1997	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001545- RIDOT_000001548
4/12/1997	Timesheet	Joan Martel - Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001549- RIDOT_000001552
4/5/1997	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001553- RIDOT_000001556
11/30/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001558- RIDOT_000001561
11/9/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001562- RIDOT_000001566
11/16/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001567- RIDOT_000001571
10/26/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001577- RIDOT_000001581
6/22/1996	Timesheet	Linda M Duffy- Aetna Bridge Company- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001582- RIDOT_000001587
5/11/1996	Timesheet	Linda M Duffy- Aetna Bridge Company- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001588- RIDOT_000001589

4/13/1996	Timesheet	Linda M Duffy - AETNA Bridge- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information	RIDOT_000001590-RIDOT_000001591
11/20/2023	Correspondence	Barletta-Atena I-195 Washington Bridge North Phase 2 JV	RIDOT	None	Invoicing hours for the month of November 2023.	Deliberative Process	RIDOT_000002310-RIDOT_000002315
8/16/2023	Daily Activity Report	RIDOT- James Twomey	RIDOT	None	Daily Activity Log	Non-Responsive Materials	RIDOT_000003165-RIDOT_000003169
3/8/2023	Correspondence	RIDOT	Barletta/Aetna Washington Bridge Phase 2 JV	None	Project Status Meeting- Meeting Agenda	Non-Responsive Materials	RIDOT_000003424-RIDOT_000003427
2/9/2024	Email	RIDOT- Anthony Pompei	Lori Fisette, Loren Doyle	Steven Soderlund	Internal Office Emails	Deliberative Process	RIDOT_000004288-RIDOT_000004289
4/20/2017	Email	Kristen Capaldi	Anthony Pompei	None	Internal Office Emails	Deliberative Process	RIDOT_000004388-RIDOT_000004389
12/16/2023	Email	Anthony Palombo	Keith Gaulin	John Preiss	Internal Office Emails	Deliberative Process	RIDOT_000004816-RIDOT_000004822
12/16/2023	Email	Anthony Rotondo	Keith Gaulin, Carlos Padilla	John Preiss, Anthony Pompei, Anthony Palombo	Internal Office Emails	Deliberative Process	RIDOT_000004968-RIDOT_000004974
12/13/2023	Email	Paul McGuinness - Mbaker	Marc D'Amore, Keith Gaulin	Anthony Pompei, John Preiss	Internal Office Emails	Deliberative Process	RIDOT_000005233-RIDOT_000005239
12/14/2023	Email	Keith Gaulin	Anthony Pompei, John Preiss Corey Richard, Anthony Rotondo	Kristina Hanes, Joseph Allwarden, Dave Fish, Steven Soderlund	Internal Office Emails	Deliberative Process	RIDOT_000005541-RIDOT_000005543
11/3/2017	Email	Robert Rocchio	Peter Alviti Jr, Shoshana Lew, David Fish, Loren Doyle	Georgette Chahine, Kieth Gaulin, David Cluley	Internal Office Emails	Work Product	RIDOT_000005764-RIDOT_000005765
12/20/2023	Email	Mary Vittoria Bertrand	Keith Gaulin	None	Internal Office Emails	Deliberative Process	RIDOT_000006168-RIDOT_000006172
4/25/2017	Email	Kristen Capaldi	Paul DelCioppio	None	Internal Office Emails	Deliberative Process	RIDOT_000006336-RIDOT_000006338
Unknown Date	Text Message		Pam Cotter, Liz P. Lori Fisette, John Igliozzi, Director Alviti, 401-527-7385	None	Text Messages between RIDOT Employees and Counsel for RIDOT	Attorney Client Privilege	RIDOT_000007661
1/18/7777	Text Message		Pam Cotter, Liz P. Lori Fisette, John Igliozzi, Director Alviti, 401-527-7385, Bob Rocchio, Steven Pristawa	None	Text Messages between RIDOT Employees and Counsel for RIDOT	Attorney Client Privilege	RIDOT_000007662
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007717-RIDOT_000007723
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007777
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007778-RIDOT_000007784
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007804-RIDOT_000007815
10/11/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007822-RIDOT_000007828
2/9/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007829-RIDOT_000007834

9/9/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000007835-RIDOT_000007841
5/24/2023	Email	Anthony Pompei	David Raposa, Gentry Andrews	Louis MacCarone, Steven Soderlund	Internal Office Emails	Deliberative Process	RIDOT_000007958-RIDOT_000007961
9/13/2022	Email	Anthony Palombo	Anastasia Wachter	Loren Doyle, Linda Burke, Lori Fiset, Carlos Padilla, Brett Campos, Jim Primeau, James McGinn, Anthony Pompei, Louis MacCarone	Internal Office Emails	Non-Responsive Materials	RIDOT_000008661-RIDOT_000008867
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008876-RIDOT_000008882
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008885-RIDOT_000008890
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008915-RIDOT_000008921
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008922-RIDOT_000008928
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008929-RIDOT_000008940
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_0000089143-RIDOT_000008949
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008950-RIDOT_000008956
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008959-RIDOT_000008970
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000008995-RIDOT_000009001
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000009006-RIDOT_000009017

1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis MacCarone, James Primeau, James McGinn, Lori Fiset, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails	Non-Responsive Materials	RIDOT_000009181-RIDOT_000009187
1/27/2024	Email	Lisbeth Pettengill	Andrea R Palagi, Charles St. Martin III	Matthew Sheaff, Olivia Darocha	Internal Office Emails	Deliberative Process	RIDOT_000010411-RIDOT_000010413
12/15/2023	Correspondence	Elizabeth Correria - Senior Historic Preservation Specialist	Devon Kurtz, Executive Director, Blackstone Heritage Corridor, Inc.	Begin, Byrne, Correia, Fahey, Palumbo, Soderlund	Data Sheet	Deliberative Process	RIDOT_000011044-RIDOT_000011046
2/8/2019	Correspondence	AECOM	RIDOT	None	Invoices from AECOM	Non-Responsive Materials	RIDOT_000011423-RIDOT_000011433
12/15/2006	Correspondence	RIDOT	RIDOT	None	RFI Tracking Sheet	Deliberative Process	RIDOT_000014361
12/12/1997	Correspondence	Paul M. Jordan, P.E. Senior Project Manager- VHB	Kazem Farhoumand, P.E. Managing Engineer, Bridge Design	Dennis Ledo- RIDOT	VHB Correspondence to RIDOT	Non-Responsive Materials	RIDOT_000014418
10/13/2010	Correspondence	Peter A. Healey, P.E. - Acting Chief Civil Engineer	Jean Boyle, Director, Department of Planning	Smith, Palumbo, Fish, Healey, Pavia, Gagnon, Hebert, Simpson, Emidy	Correspondence between RIDOT and Providence Preservation Society	Deliberative Process	RIDOT_000014456-000014459
11/25/1996	Correspondence	Dennis Ledo	Kazem Farhoumand, P.E. Managing Engineer, Bridge Design	Mr. Farhoumand	Letter of Transmittal	Deliberative Process	RIDOT_000014564
11/7/1195	Correspondence	Dennis Ledo	Kazem Farhoumand, P.E. Managing Engineer, Bridge Design	Mr. Farhoumand	Letter of Transmittal	Deliberative Process	RIDOT_000014631
11/3/1995	Correspondence	Edmund T. Parker, Jr., P.E.	David A. Ferguson	Parker, Bennett, Smith, Farhoumand, Faraj, Consultant (Paul Jordan)	Advance Work Authorization	Deliberative Process	RIDOT_000014660
10/3/1995	Correspondence	Dennis Ledo	Internal RIDOT- Unknown	None	Bridge Routing Slip	Deliberative Process	RIDOT_000014695, RIDOT_000014697
12/1/1995	Correspondence	Gilbert Pemberton, II	Paul M. Jordan, P.E.	K. Farhoumand- RIDOT, B. Patel- VHB, S.D. Morgan- NYNEX, J.A. Scungionom Jr. - RIDOT,	Letter of Transmittal	Deliberative Process	RIDOT_000014699- RIDOT_000014700
3/13/1996	Correspondence	Internal RIDOT- Unknown	Internal RIDOT- Unknown	None	Handwritten Note	Deliberative Process	RIDOT_000014733
2/5/1996	Correspondence	William F. Bundy, Leo Cirello, James R. Capaldi, P.E.	Gordon G. Hoxie	Messrs. Bundy, Capaldi, Parker, Bennett, Farhoumand, Annarummo, Sasso, Jackson, DeVecchio, Cirello, Alves, Scungio, Kydd, Prata, Mses, Hollands, Picard		Non-Responsive Materials Deliberative Process	RIDOT_000014754, RIDOT_000014756
2/6/1996	Correspondence	Paul M. Jordan, P.E. Senior Project Manager- VHB	Paul Annarummo, P.E.	Kazem Farhoumand	Internal Handwritten Notes	Deliberative Process	RIDOT_000014759- RIDOT_000014761
7/12/1993	Correspondence	The Commonwealth	RIDOT		Bridge Analysis and Rating	Deliberative Process	RIDOT_000014862- RIDOT_000014880
10/28/2003	Correspondence	State of Rhode Island -Construction Unit	State of Rhode Island - Transportation	Chief Engineer	Inter-office Memo	Deliberative Process	RIDOT_000022483- RIDOT_000022485
5/30/1996	Correspondence	RI Department of Transportation	State of Rhode Island - Transportation	None	Daily Force Account Work Sheet	Deliberative Process	RIDOT_000022744- RIDOT_000022747
5/30/1997	Correspondence	State of Rhode Island -			Report of Change	Deliberative Process	RIDOT_000022774- RIDOT_000022775
4/9/1998	Correspondence	Anthony DeAngelis, Deputy Chief	Kazem Farhoumand, P.E.	W. Flanders, P.E., J. Pilkington, P. DeSimone	Inter-office Memo	Deliberative Process	RIDOT_000023006
8/6/1996	Correspondence	Peter A. DeSimone	None	None	Inter-office Memo	Deliberative Process	RIDOT_000023090- RIDOT_000023091
7/30/1996	Correspondence	Kazem Farhoumand, P.E.	P. DeSimone	None	Letter of Transmittal	Deliberative Process	RIDOT_000023095- RIDOT_000023097, RIDOT_000023099
7/25/1996	Correspondence	John B. McGee	Kazem Farhoumand, P.E.	Messrs. Capaldi, Parker, Fondi, Pilkington, DeSimone	Inter-office Memo	Deliberative Process	RIDOT_000023100- RIDOT_000023101
5/24/1996	Correspondence	Kazem Farhoumand, P.E.	John B. McGee	Messrs. Capaldi, Parker, Annarummo, Jackvony, Boardman, Nickelson	Inter-office Memo	Deliberative Process	RIDOT_000023177- RIDOT_000023178
10/22/1996	Correspondence	RIDOT	RIDOT	None	Inspector Report of Daily Activity	Deliberative Process	RIDOT_000024393
9/5/1996	Correspondence	RIDOT	RIDOT	None	Internal Handwritten Notes	Non-Responsive Personal Information	RIDOT_000024510

10/21/2024	Email	James Fitzpatrick	Anthony Pompei, Anthony Jr, Gentry	Kyle Ferreira	Internal Handwritten Notes	Non-Responsive Personal Information	RIDOT_000025559
2/28/2024	Cost Details	Barletta Heavy Division, Inc.	RIDOT	None	Internal Handwritten Notes	Non-Responsive Personal Information	RIDOT_000025610, RIDOT_000025612- 000025613, RIDOT_000025615- RIDOT_000025616
3/1/2024	Email	Nuno M. Vasconcelos	David Raposa, Andrew, Jr, Gentry, Lane, Tracy, Postle, Kenneth	None	Personal Information	Non-Responsive Personal Information	RIDOT_000025686
5/17/2024	Pay Estimate Recap	Barletta Heavy Division, Inc.; AETNA	RIDOT	None	Internal Handwritten Notes	Non-Responsive Personal Information	RIDOT_000025926, RIDOT_000025942, RIDOT_000025944-000025945, RIDOT_000025947- RIDOT_000025948
3/14/2024	Email	Sean Raymond	Anthony Pompei, Megan E. Hali	Steve Pristawa, Steve Soderlund, Anthony Mako, Andrew, Jr, Gentry, Raposa, David	Internal Office Email	Deliberative Process	RIDOT_000026026- RIDOT_000026027
4/2/2024	Email	Anthony Pompei	James Fitzpatrick, Jeffrey Klein	Steve Pristawa, Steve Soderlund, Anthony Mako, Andrew, Jr, Gentry, Kyle Ferreira, George Lay, Jeff Bostock	Handwritten notes	Non-Responsive Personal Information	RIDOT_000026029
1/31/2022	Certificate of Compliance	Liddell Leasing Corp	Barletta/AETNA I-195 Washington Bridge North Phase 2 JV	Notes	Handwritten notes	Non-Responsive Personal Information	RIDOT_000031823
10/27/2021	Email	Bryan Blackerby	David Raposa	Anthony Pompei, Louis Maccarone, Michael Swift, David Raposa	Handwritten notes	Non-Responsive Personal Information	RIDOT_000031858
10/21/2021	Meeting Agenda	RIDOT	Barletta/AETNA, VHB	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032334, RIDOT_000032336
12/1/2021	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032351, RIDOT_000032354
1/26/2022	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032364- RIDOT_000032367
5/4/2022	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032379- RIDOT_000032381
11/16/2022	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032424
1/25/2023	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032440, RIDOT_000032442
2/8/2023	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032444
4/5/2023	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032448, RIDOT_000032450
11/15/2023	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	Non-Responsive Personal Information	RIDOT_000032495- RIDOT_000032497
12/6/2023	Email	Anthony Pompei	Anthony Mako	None	Internal Office Email	Deliberative Process	RIDOT_000040673
2/2/2024	Email	Anthony Pompei	Jeanette Smith, Lizbeth Pettengill, Robert Rocchio, Fisette Lori, Loren Doyle	Steven Soderlund	Internal Office Email	Deliberative Process	RIDOT_000040685
2/5/2024	Presentation	RIDOT	FHWA	none	Draft Prensation	Work Product	RIDOT_000040687
1/24/2024	Email	James Isabella	Anthony Pompei, Anthony Jr, Gentry	Soderlund Steven; Raposa, David	Internal Office Email	Deliberative Process	RIDOT_000040730
1/24/2024	Attachment to email	James Isabella	Anthony Pompei, Anthony Jr, Gentry	Soderlund Steven; Raposa, David	Internal Office Email Attachments	Work Product/Deliberative Process	RIDOT_000040731
1/24/2024	Attachment to email	James Isabella	Anthony Pompei, Anthony Jr, Gentry	Soderlund Steven; Raposa, David	Internal Office Email	Work Product/Deliberative Process	RIDOT_000040732
1/24/2024	Attachment to email	James Isabella	Anthony Pompei, Anthony Jr, Gentry	Soderlund Steven; Raposa, David	Internal Office Email	Work Product/Deliberative Process	RIDOT_000040751



12/14/2023	Correspondence	RIDOT	James M. Gallant Jr., P.E.	None	Internal Office Memo and Routing Slip	Deliberative Process	RIDOT_000040901
1/25/2024	Email	John Preiss	Christopher Hart, P.E., Keith Gaulin	None	Internal Office Email	Deliberative Process	RIDOT_000040929
12/21/2023	Correspondence	Christopher S. Hart, P.E.	John Megdichian	None	Internal Office Memo and Routing Slip	Deliberative Process	RIDOT_000041032-RIDOT_000041033
12/21/2023	Correspondence	Christopher S. Hart, P.E.	John Megdichian	None	Internal Office Memo and Routing Slip	Deliberative Process	RIDOT_000041035-RIDOT_000041036
12/12/2023	Correspondence	Michael Murdock	William Raused, Jeff Klein	Thomas Da Lomba, Geoffrey Dilg	Internal Document	Deliberative Process	RIDOT_000041185
12/28/2023	Correspondence	Jeff Klein	RIDOT	None	Internal Document	Deliberative Process	RIDOT_000041206
12/14/2023	Correspondence	James M. Gallant Jr., P.E.	John Megdichian	None	Internal Office Document	Deliberative Process	RIDOT_000041240-RIDOT_000041241
1/1/2024	Correspondence	RIDOT	RIDOT	None	Internal Office Document	Work Product	RIDOT_000041246
1/1/2024	Correspondence	RIDOT	RIDOT	None	Internal Office Document	Work Product	RIDOT_000041271
1/23/2024	Email	John Preiss	Christopher Hart, P.E., Keith Gaulin	None	Internal Office Email	Deliberative Process	RIDOT_000041319
3/6/2022	Email	John Preiss	Keith Gaulin	None	Internal Office Email	Deliberative Process	RIDOT_000041436
3/6/2022	Email	John Preiss	Keith Gaulin	None	Internal Office Email	Deliberative Process	RIDOT_000041440
1/29/2024	Email	Dewei Meng	Keith Gaulin	Mary Vittoria Bertrand, John Preiss	Internal Office Email	Deliberative Process	RIDOT_000041712
1/26/2024	Attachment to email	VN Engineers, Inc	Jeff Klein, P.E.	None	Attachment to an Internal Email Chain	Work Product	RIDOT_000041714
12/12/2023	Email	Anthony Pompei	Keith Gaulin	John Preiss	Internal Office Email	Deliberative Process	RIDOT_000041761
10/19/2017	Email	Lori Fiset	Anthony Pompei; Anthony Marchetti	None	Internal Office Email	Deliberative Process	RIDOT_000041954
1/25/2024	Correspondence	James Twomey	None	None	Internal Document	Personal Information	RIDOT_000042234-RIDOT_000042236
8/22/2017	Email	Kristen Capaldi	Paul DelCioppio	Anthony Marchetti, Anthony Pompei	Internal Office Email	Deliberative Process	RIDOT_000042482
9/13/2016	Email	Christopher Hart	Kenneth Buteau	Jan Bak	Internal Office Email	Deliberative Process	RIDOT_000042696
9/13/2019	Memo	Christopher Hart	George Chahine	None	Internal RIDOT Document	Deliberative Process	RIDOT_000042697
12/16/2023	Email	Keith Gaulin	Anthony Rotondo, Carlos Padilla	John Preiss, Anthony Pompei, Anthony Palombo	Internal Office Email	Deliberative Process	RIDOT_000042698
6/13/2022	Email	Anastasia Wachter	Anthony Palombo	Lori Fiset, Anthony Pompei	Internal Office Email	Deliberative Process	RIDOT_000042826
5/19/2023	Email	Anthony Pompei	Anthony Palombo	Carlos Padilla, Louis Maccarone, Brett Campos, Audy Bendigo	Internal Office Email	Deliberative Process	RIDOT_000042857
5/4/2023	Routing Slip	Anthony Pompei	Lori Fiset	None	Internal RIDOT Document	Deliberative Process	RIDOT_000042858-RIDOT_000042859
7/27/2022	Email	Esam Eid	Anthony Rotondo	Steven Soderlund, David Walsh	Internal RIDOT Document	Deliberative Process	RIDOT_000042944
12/14/2023	Email	Steven Soderlund	Lori Fiset	None	Internal RIDOT Document	Deliberative Process	RIDOT_000042960
12/14/2023	Email	Loren Doyle	Derek Torrey, Lori Fiset	None	Internal RIDOT Document	Deliberative Process	RIDOT_000042965
5/19/2023	Email	Anthony Palombo	Anthony Pompei	Carlos Padilla, Louis Maccarone, Brett Campos, Audy Bendigo	Internal RIDOT Document	Deliberative Process	RIDOT_000042989
5/4/2023	Routing Slip/Memo	Anthony Pompei	Lori Fiset	None	Internal RIDOT Document	Deliberative Process	RIDOT_000042990-RIDOT_000042991
2/17/2021	Email	Anthony Cimaglia III	Anthony Pompei	None	Internal RIDOT Document	Deliberative Process	RIDOT_000043043
8/22/2017	Email	Kristen Capaldi	Paul DelCioppio	Anthony Marchetti, Anthony Pompei	Internal RIDOT Document	Deliberative Process	RIDOT_000043115
12/8/2023	Email	Anthony Pompei	Lori Fiset, George Ley	Steven Soderlund	Internal RIDOT Document	Deliberative Process	RIDOT_000043151
3/11/2019	Email	Anthony Pompei	Anthony Marchetti	None	Internal RIDOT Document	Deliberative Process	RIDOT_000043153
1/30/2024	Email	Anthony Pompei	Steven Soderlund, George Lay, Lawrence Bailey, David Raposa, Andrews, Jr, Gentry	None	Internal RIDOT Document	Deliberative Process	RIDOT_000043157
11/12/2021	Email	Anthony Pompei	Charles Sr, Martin III	None	Internal RIDOT Document	Deliberative Process	RIDOT_000043179
3/11/2019	Email	Anthony Marchetti	Anthony Pompei	None	Internal Office Email	Deliberative Process	RIDOT_000043370
1/24/2024	Email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Internal Office Email	Deliberative Process	RIDOT_000043382
1/24/2024	Attachment to email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Attachment to an Internal Email Chain	Deliberative Process	RIDOT_000043383
1/24/2024	Attachment to email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Attachment to an Internal Email Chain	Deliberative Process	RIDOT_000043384

1/24/2024	Attachment to email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Attachment to an Internal Email Chain	Deliberative Process	RIDOT_000043403
1/25/2024	Attachment to email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Attachment to an Internal Email Chain	Deliberative Process	RIDOT_000043404
1/30/2024	Email	Anthony Pompei	Steven Soderlund, George Ley, Larry Bailey, Raposa David, Andrews, Jr, Gentry.	None	Email	Deliberative Process	RIDOT_000043427
10/19/2017	Email	Kristen Capaldi	Anthony Pompeo, Marchetti Anthony	Lori Fisette, David Fish	Internal office email	Deliberative Process	RIDOT_000043591
10/19/2017	Attachment to email	Kristen Capaldi	Anthony Pompeo, Marchetti Anthony	Lori Fisette, David Fish	Attachment to an Internal Email Chain	Deliberative Process	RIDOT_000043591
10/19/2017	Attachment to email	Kristen Capaldi	Anthony Pompeo, Marchetti Anthony	Lori Fisette, David Fish	Attachment to an Internal Email Chain	Deliberative Process	RIDOT_000043592
1/3/2018	Email	Daniel Coffland	Kristen Capaldi, Paul DelCioppo	None	Internal Office Email	Deliberative Process	RIDOT_000043632
11/29/2017	Narrative	RIDOT	RIDOT	None	Internal Document	Deliberative Process	RIDOT_000043633
12/13/2017	RIDOT Portal	RIDOT	RIDOT	None	Internal Document	Deliberative Process	RIDOT_000043662
12/13/2017	RIDOT Portal	RIDOT	RIDOT	None	Internal Document	Deliberative Process	RIDOT_000043667
1/30/2024	Email	Anthony Pompei	Steven Soderlund, George Ley, Larry Bailey, Raposa David, Andrews, Jr, Gentry.	None	Email	Deliberative Process	RIDOT_000043678
	Narrative	RIDOT	RIDOT	None	Narrative	Deliberative Process	RIDOT_000043698
6/26/2023	Email	Nicole Leporacci	Scott Hobson	Alias Richardson, Erik Johnson, Anthony Pompei, Louis Maccarone, Jeffrey Klein	Internal RIDOT Email	Deliberative Process	RIDOT_000043865
1/30/2024	Email	Anthony Pompei	Anthony Mako, Steven Soderlund, George Lay, Lawrence Bailey, David Raposa, Gentry Andrews, Jr	None	Internal RIDOT Email	Deliberative Process	RIDOT_000044397
9/11/2017	Email	Paul DelCioppo	Daniel Coffland	None	Internal RIDOT Email	Deliberative Process	RIDOT_000044429-RIDOT_000044430
5/3/2017	Meeting Agenda	RIDOT- Paul DelCioppo	Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr. Paul DelCioppo, Dan Coffland, Rick Macksound, Dillon Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapierito, Corey Richard	None	Project Status Meeting Notes	Deliberative Process	RIDOT_000044431
2/17/2021	Email	Anthony Pompei	Anthony Cimaglia III	Ryan Salvas	Internal RIDOT Email	None Responsive	RIDOT_000044439
3/6/2024	Cost Details	Barletta Heavy Division, Inc	RIDOT	None	Cost Detail	Personal Information	RIDOT_000044533
9/15/2015	Cost Details	AECOM, Aries, Commonwealth	RIDOT	None	Cost Detail	Personal Information	RIDOT_000044870- RIDOT_000044871, RIDOT_000044881, RIDOT_000044884, RIDOT_000044888- RIDOT_000044891
2/8/2018	Cost Details	AECOM	RIDOT	None	Cost Detail	Personal Information	RIDOT_000044985- RIDOT_000044987, RIDOT_000044991
12/7/2017	Cost Details	AECOM	RIDOT	None	Cost Detail	Personal Information	RIDOT_000045018- 000045019, RIDOT_000045024
8/19/2020	Cost Details	AECOM, Aries, Commonwealth	RIDOT	None	Cost Detail	Personal Information	RIDOT_000045030- RIDOT_000045031, RIDOT_000045035, RIDOT_000045046,
9/10/2019	Invoice	AECOM	RIDOT	None	Invoice	Personal Information	RIDOT_000045072, RIDOT_000045081
6/10/2020	Routing Slip	David Cluley, PE	John Megdrichian	John Preiss	Internal Document	Deliberative Process	RIDOT_000045097
3/11/2020	Memo & Routing Slip	David Cluley, PE	John Megdrichian	John Preiss	Internal Document	Deliberative Process	RIDOT_000045102, RIDOT_000045103
12/3/2020	Email	David Cluley, PE	Monica Raposo,	Lisa Shevlin	Internal RIDOR Email	Deliberative Process	RIDOT_000045118- RIDOT_000045119
3/29/2022	Memo & Routing Slip	David Cluley, PE	John Megdrichian	John Preiss	Internal Document	Deliberative Process	RIDOT_000045135- RIDOT_000045136

12/14/2023	Memo & Routing Slip	James M. Gallant Jr., P.E.	John Megrdichian	John Preiss & C. Hart	Internal Document	Deliberative Process	RIDOT_000045320 RIDOT_000045321
6/18/2023	Memo & Routing Slip	John Megrdichian	Christopher Hart, P.E.	John Preiss & C. Hart	Internal Document	Deliberative Process	RIDOT_000045326 RIDOT_000045327
2/18/2021	Email	Ryan Salvas	Anthony Cimaglia III, James Orr	None	Internal Email	Deliberative Process	RIDOT_000045465 RIDOT_000045466
2/15/1996	Correspondence	RIDOT	RIDOT	None	Internal Document	Personal Information	RIDOT_000046367 RIDOT_000046368
1/27/1992	Report	A.G. Lichtenstein & Associates, Inc	Richard P. Snow, P.E.	None	Report	Deliberative Process	RIDOT_000046514 RIDOT_000046554
12/14/2010	Correspondence	Michael A. Hebert	David Fish, P.E.	None	Inter-office Memo	Deliberative Process	RIDOT_000046991
5/24/1996	Correspondence	Robert V. Atcherley	Peter DeSimone	J. McGee, J. Pilkington	Correspondence	Deliberative Process	RIDOT_000047621
11/29/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo	Correspondence	Deliberative Process	RIDOT_000047943
11/29/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo	Correspondence	Deliberative Process	RIDOT_000047953 RIDOT_000047957
10/4/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo	Correspondence	Deliberative Process	RIDOT_000047982 RIDOT_000047984
11/14/1995	Correspondence	John McFee	Kazem Farhoumand, P.E.	Kazem Farhoumand, P.E.	Correspondence	Deliberative Process	RIDOT_000048009 RIDOT_000048010
11/6/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo, David Arnold	Correspondence	Deliberative Process	RIDOT_000048044
11/6/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo, David Arnold, Antonio P. Franco, Dr. Randall Poston	Correspondence	Deliberative Process	RIDOT_000048057 RIDOT_000048059
	Correspondence	RIDOT	RIDOT	None	Correspondence	Deliberative Process	RIDOT_000048081
12/14/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo	Correspondence	Deliberative Process	RIDOT_000048140 RIDOT_000048144
12/6/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	None	Correspondence	Deliberative Process	RIDOT_000048159
11/15/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	None	Correspondence	Deliberative Process	RIDOT_000048240
1/5/1996	Correspondence	Kazem Farhoumand, P.E.	Dennis Ledo, P.E.	None	Inter-office Memo	Deliberative Process	RIDOT_000048243
2/19/1996	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, PE. Dennis Ledo, P.E.; E.T. Parker	None	Memo	Deliberative Process	RIDOT_000048276 RIDOT_000048277
4/20/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo	Correspondence	Personal Information	RIDOT_000048429
	Memo	RIDOT	RIDOT		Internal Handwritten Notes	Deliberative Process	RIDOT_000049285
	Memo	RIDOT	RIDOT		Internal Handwritten Notes	Deliberative Process	RIDOT_000049286
11/15/2017	Meeting Agenda	Dan Coffland, Paul DelCioppio	George Ley, Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr., Paul DelCioppop, Dan Coffland, Rick Macksound, Dillon Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapietro, Corey Richard	None	Agenda Meeting Notes	Non- Responsive Materials Deliberative Process	RIDOT_000049331
1/5/2018	Correspondence	Nicholas A. Giardino	Kristen Capaldi	Stephen Ricci, Paul Del Cioppop, Dillon Fahey	Cost Breakdown	Non- Responsive Materials	RIDOT_000049440
6/14/2017	Meeting Agenda	Paul DelCioppio	George Ley, Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr., Paul DelCioppop, Dan Coffland, Rick Macksound, Dillon Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapietro, Corey Richard	None	Project Status Meeting	Deliberative Process	RIDOT_000049515 RIDOT_000049518
		David W. Fish P.E.	Steven A. Cardj	Beltram, Capaldi, Fisette, Fish, Igliazzi, Marchetti, Pompei	Correspondence	Deliberative Process	RIDOT_000049569 RIDOT_000049570
11/14/2018	Meeting Agenda	Paul DelCioppio	George Ley, Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr., Paul DelCioppop, Dan Coffland, Rick Macksound, Dillon Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapietro, Corey Richard	None	Project Status Meeting Notes	Non-Responsive Materials	RIDOT_000049676 RIDOT_000049677

			George Ley, Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr., Paul DelCioppo, Dan Coffland, Rick Macksound, Dillion Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapietro, Corey Richard				
4/4/2018	Meeting Agenda	Paul DelCioppo		None	Project Status Meeting	Non-Responsive Materials	RIDOT_000049688
1/26/2024	Invoice	AECOM	RIDOT	None	Invoice	Personal Information	RIDOT_000049861, RIDOT_000049863- RIDOT_000049875, RIDOT_000049877- RIDOT_000049883
5/16/2024	Payroll Summary	AECOM	RIDOT	none	Payroll Summary	Personal Information	RIDOT_000049897, RIDOT_000049898
7/17/2025	Checklist	Gentry Andrews, Jr.	Steven Soderlund, P.E.	Finals, Anthony Pompei	Internal Memo	Deliberative Process	RIDOT_000049915- RIDOT_000049918
2/12/2024	Report Summaries	RIDOT	RIDOT	None	Internal Report Summaries	Deliberative Process	RIDOT_000040805
4/18/2024	Request for Proposal	RIDOT	None	None	Draft RFP Part 1	Work Product	RIDOT_000054219- RIDOT_000054271
4/19/2024	Request for Proposal	RIDOT	None	None	Draft RFP Part 2	Work Product	RIDOT_000054272- RIDOT_000054411

# EXHIBIT E

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**From:** Takisha Richardson  
**Sent:** Monday, November 17, 2025 4:06 PM  
**To:** Mellado, Chris  
**Cc:** Braisy Ruiz; Edward D. Pare III; rhodeislandbridgez12152322@cohenmilstein.filevineapp.com; Blease, Jeffrey R.; Morris, Benjamin J.  
**Subject:** RE: State's Response to JV's Deficiency Letter Dated 10/3/25  
**Attachments:** State of Rhode Island Updated Privilege Log Previously Served on 10.15.2025.pdf

**\*\*\* EXTERNAL EMAIL MESSAGE \*\*\***

Good afternoon, Chris,

Please find attached our updated privilege log. The previously withheld documents, which are now being released, will be served tomorrow. In reviewing the privilege log, please note there are three categories of documents: 1. documents being withheld and the privilege being asserted; 2. redacted documents, along with the basis for their redactions; and 3. documents that were previously withheld but are now being produced.

As indicated on our meet and conferral call earlier this month, we are currently reviewing documents related to the JV's 3<sup>rd</sup> RTP, which is due today. Are you ok with providing the State an extension until December 10, 2025, to respond to the JV's 3<sup>rd</sup> RTP?

As always, thanks for your professional courtesy in considering this request.

**Takisha Richardson**  
Attorney

**COHENMILSTEIN**

**Cohen Milstein Sellers & Toll PLLC**

11780 U.S. Highway One | Suite N500  
Palm Beach Gardens, FL 33408  
phone | direct 561.515.1400

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**From:** Mellado, Chris <chris.mellado@foley.com>  
**Sent:** Friday, October 31, 2025 10:54 AM  
**To:** Takisha Richardson <TRichardson@cohenmilstein.com>  
**Cc:** Braisy Ruiz <br Ruiz@cohenmilstein.com>; Edward D. Pare III <epare@savagelawpartners.com>; rhodeislandbridgez12152322@cohenmilstein.filevineapp.com; Blease, Jeffrey R. <JBlease@foley.com>; Morris, Benjamin J. <BMorris@foley.com>  
**Subject:** RE: State's Response to JV's Deficiency Letter Dated 10/3/25

Takisha,

Thank you for providing your written response to our October 3, 2025 confer letter this morning at 9:58 AM, although it had originally been promised by close of business on Monday, October 27, 2025. We note that this

Response came an hour before today's scheduled meet-and-confer, at which time you also requested to move the call to another date.

This is the State's second instance of requesting to reschedule our meet-and-confer on the same day it was scheduled to occur. Our previously scheduled meet-and-confer for October 23, 2025 was likewise postponed at your request only hours before it was set to occur.

Please confirm your availability for a meet-and-confer on one of the following dates/times (EST):

- Monday, November 3, 2025, between 3:00–5:00 PM
- Tuesday, November 4, 2025, between 12:00–3:00 PM

Given these repeated same-day rescheduling requests, it is important that we proceed without further delay to address the issues raised in our letter and keep discovery moving forward at a meaningful pace.

We look forward to your confirmation.

Thank you,

**Chris Mellado**  
Associate

**Foley & Lardner LLP | Orlando, FL**  
Phone 407.236.5868  
View My Bio | Visit [Foley.com](https://foley.com) | [chris.mellado@foley.com](mailto:chris.mellado@foley.com)



---

**From:** Takisha Richardson <[TRichardson@cohenmilstein.com](mailto:TRichardson@cohenmilstein.com)>  
**Sent:** Friday, October 31, 2025 10:06 AM  
**To:** Mellado, Chris <[chris.mellado@foley.com](mailto:chris.mellado@foley.com)>  
**Cc:** Braisy Ruiz <[bruiz@cohenmilstein.com](mailto:bruiz@cohenmilstein.com)>; Edward Pare III <[epare@savagelawpartners.com](mailto:epare@savagelawpartners.com)>; [rhodeislandbridgez12152322@cohenmilstein.filevineapp.com](mailto:rhodeislandbridgez12152322@cohenmilstein.filevineapp.com)  
**Subject:** RE: State's Response to JV's Deficiency Letter Dated 10/3/25

**\*\*\* EXTERNAL EMAIL MESSAGE \*\*\***

Good morning, Chris,

I apologize, but I need to reschedule our call this morning. I received a bounce-back in response to our reply to your deficiency letter, stating that you are out of the office today, so I'm unsure if you are still available. Please provide times next week that work for your schedule, and I will promptly get back to you with an agreeable time for our meeting.

Thanks

**Takisha Richardson**  
Attorney

**COHENMILSTEIN**

**Cohen Milstein Sellers & Toll PLLC**  
11780 U.S. Highway One | Suite N500  
Palm Beach Gardens, FL 33408  
phone | direct 561.515.1400



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**From:** Takisha Richardson  
**Sent:** Friday, October 31, 2025 9:58 AM  
**To:** Mellado, Chris <[chris.mellado@foley.com](mailto:chris.mellado@foley.com)>  
**Cc:** Braisy Ruiz <[bruiz@cohenmilstein.com](mailto:bruiz@cohenmilstein.com)>; Edward Pare III <[epare@savagelawpartners.com](mailto:epare@savagelawpartners.com)>;  
[rhodeislandbridgez12152322@cohenmilstein.filevineapp.com](mailto:rhodeislandbridgez12152322@cohenmilstein.filevineapp.com)  
**Subject:** State's Response to JV's Deficiency Letter Dated 10/3/25

Good afternoon, Chris,

Please see the attached letter in advance of our call.

**Takisha Richardson**  
Attorney

**COHENMILSTEIN**

**Cohen Milstein Sellers & Toll PLLC**  
11780 U.S. Highway One | Suite N500  
Palm Beach Gardens, FL 33408  
phone | direct 561.515.1400

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DATE & TIME	RECORD TYPE	AUTHOR	RECIPIENT	COPYEES	SUBJECT MATTER	PRIVILEGE	BATE NUMBERS
5/24/2023	Email	Anthony Pompei	David Raposa, Gentry Andrews	Louis Maccarone, Steven Soderlund	Internal Office Emails regarding how to pay for the catch basin cleaning grate replacements	Deliberative Process	RIDOT_000007958-RIDOT_000007961
3/13/1996	Correspondence	Internal RIDOT- Unknown	Internal RIDOT- Unknown	None	Internal RIDOT note Regarding Review	Deliberative Process	RIDOT_000014733
2/6/1996	Correspondence	Paul M. Jordan, P.E. Senior Project Manager- VHB	Paul Annarummo, P.E.	Kazem Farhoumand	Internal Handwritten Notes regarding lane closures	Deliberative Process	RIDOT_000014759-RIDOT_000014761
3/14/2024	Email	Sean Raymond	Anthony Pompei; Megan E. Hali	Steve Pristawa;Steve Soderlund, Anthony Mako, Andrew, Jr. Gentry, Raposa, David	Internal Office Email discussing comments submitted by FHWA	Deliberative Process	RIDOT_000026026-RIDOT_000026027
5/19/2023	Email	Anthony Pompei	Anthony Palombo	Carlos Padilla, Louis Maccarone, Brett Campos, Audy Bendigo	Internal Office Email regarding the need to redo the ROC to the Design RIC 2014-EB-003	Deliberative Process	RIDOT_000042857
7/27/2022	Email	Esam Eid	Anthony Rotondo	Steven Soderlund, David Walsh	Internal RIDOT Document regarding Fiscal Year 2021 Bridge Replacement Costs	Deliberative Process	RIDOT_000042944
5/19/2023	Email	Anthony Palombo	Anthony Pompei	Carlos Padilla, Louis Maccarone, Brett Campos, Audy Bendigo	Internal RIDOT Document regarding the need to redo the ROC to the Design RIC 2014-EB-003	Deliberative Process	RIDOT_000042969
5/4/2023	Routing Slip/Memo	Anthony Pompei	Lori Fissette	None	Internal RIDOT Document routing for approval AECOM Proposal submitted May 2, 2023	Deliberative Process	RIDOT_000042990-RIDOT_000042991
2/17/2021	Email	Anthony Cimaglia III	Anthony Pompei	None	Internal RIDOT Email Re 2018-DB-059 for internal review and approval	Deliberative Process	RIDOT_000043043
8/22/2017	Email	Kristen Capaldi	Paul DelCioppio	Anthony Marchetti, Anthony Pompei	Internal RIDOT Email re scheduling a meeting with the Director	Deliberative Process	RIDOT_000043115
12/8/2023	Email	Anthony Pompei	Lori Fissette, George Ley	Steven Soderlund	Internal RIDOT email forwarding thread	Deliberative Process	RIDOT_000043151
3/11/2019	Email	Anthony Pompei	Anthony Marchetti	None	Internal RIDOT re followup to thread regarding Washington Bridge Potential Termination Questions	Deliberative Process	RIDOT_000043153
1/30/2024	Email	Anthony Pompei	Steven Soderlund, George Lay, Lawrence Bailey, David Raposa, Andrews, Jr, Gentry	None	Internal RIDOT email regarding meeting scheduled	Deliberative Process	RIDOT_000043157
11/12/2021	Email	Anthony Pompei	Charles Sr. Martin III	None	Internal RIDOTEmail regarding a press inquiry	Deliberative Process	RIDOT_000043179
3/11/2019	Email	Anthony Marchetti	Anthony Pompei	None	Internal RIDOT re followup to thread regarding Washington Bridge Potential Termination Questions	Deliberative Process	RIDOT_000043370
1/24/2024	Email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Internal Office Email regarding review of project change request	Deliberative Process	RIDOT_000043382
1/24/2024	Attachment to email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Attachment to Internal Office Email regarding review of project change request	Deliberative Process	RIDOT_000043383
1/24/2024	Attachment to email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Attachment to Internal Office Email regarding review of project change request	Deliberative Process	RIDOT_000043384
1/24/2024	Attachment to email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Attachment to Internal Office Email regarding review of project change request	Deliberative Process	RIDOT_000043403
1/25/2024	Attachment to email	Gentry Andrews, Jr.	DOT, Anthony Pompei	Steven Soderlund, David Raposa	Attachment to Internal Office Email regarding review of project change request	Deliberative Process	RIDOT_000043404
1/30/2024	Email	Anthony Pompei	Steven Soderlund, George Ley, Larry Bailey, Raposa David, Andrews, Jr, Gentry.	None	Internal RIDOT Email Re: Meeting regarding the Washington Bridge Emergency Pricing Review	Deliberative Process	RIDOT_000043427

10/19/2017	Email	Kristen Capaldi	Anthony Pompeo, Marchetti Anthony	Lori Fisette, David Fish	Internal office email reading the acceleration with temp ramp and new phasing with and without hydro demo	Deliberative Process	RIDOT_000043591
10/19/2017	Attachment to email	Kristen Capaldi	Anthony Pompeo, Marchetti Anthony	Lori Fisette, David Fish	Attachment to Internal office email reading the acceleration with temp ramp and new phasing with and without hydro demo	Deliberative Process	RIDOT_000043591
10/19/2017	Attachment to email	Kristen Capaldi	Anthony Pompeo, Marchetti Anthony	Lori Fisette, David Fish	Attachment to Internal office email reading the acceleration with temp ramp and new phasing with and without hydro demo	Deliberative Process	RIDOT_000043592
1/3/2018	Email	Daniel Coffland	Kristen Capaldi, Paul DelCioppo	None	Internal Office Email requesting construction schedule	Deliberative Process	RIDOT_000043632
11/29/2017	Narrative	RIDOT	RIDOT	None	Attachment to internal email reading the acceleration with temp ramp and new phasing with and without hydro demo	Deliberative Process	RIDOT_000043633
12/13/2017	RIDOT Portal	RIDOT	RIDOT	None	Internal Document regarding RIDOT's Management Portal	Deliberative Process	RIDOT_000043662
12/13/2017	RIDOT Portal	RIDOT	RIDOT	None	Internal Document regarding RIDOT's Management Portal	Deliberative Process	RIDOT_000043667
	Narrative	RIDOT	RIDOT	None	Internal document regarding Electrochemical Chloride Extraction	Deliberative Process	RIDOT_000043698
6/26/2023	Email	Nicole Leporacci	Scott Hobson	Alias Richardson, Erik Johnson, Anthony Pompei, Louis Maccarone, Jeffrey Klein	Internal RIDOT Email regarding review of the Draft PCN application	Deliberative Process	RIDOT_000043865
1/30/2024	Email	Anthony Pompei	Anthony Mako, Steven Soderlund, George Lay, Lawrence Bailey, David Raposa, Gentry Andrews, Jr	None	Internal RIDOT email regarding scheduling a meeting	Deliberative Process	RIDOT_000044397
5/11/2017	Email	Paul DelCioppo	Daniel Coffland	None	Internal RIDOT Email regarding May 3, 2017 meeting Minutes	Deliberative Process	RIDOT_000044429-RIDOT_000044430
5/3/2017	Meeting Agenda	RIDOT- Paul DelCioppo	Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr. Paul DelCioppo, Dan Coffland, Rick Macksound, Dillon Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapierito, Corey Richard	None	Internal RIDOT Meeting Minutes	Deliberative Process	RIDOT_000044431
2/18/2021	Email	Ryan Salvas	Anthony Cimaglia III, James Orr	None	Internal Email regarding deobligation funds for review and comment	Deliberative Process	RIDOT_000045465-RIDOT_000045466
	Correspondence	RIDOT	RIDOT	None	Internal RIDOT handwritten review notes	Deliberative Process	RIDOT_000048081
12/14/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo	Internal RIDOT handwritten review notes	Deliberative Process	RIDOT_000048140-RIDOT_000048144
12/6/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.		Internal RIDOT handwritten review notes	Deliberative Process	RIDOT_000048159
2/19/1996	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, PE, Dennis Ledo, P.E.; E.T. Parker	None	Internal note regarding change of date	Deliberative Process	RIDOT_000048276-RIDOT_000048277
2/12/2024	Report Summaries	RIDOT	RIDOT	None	Internal Report Summaries Created for Counsel	Work Product	RIDOT_000050805
4/18/2024	Request for Proposal	RIDOT	None	None	Internal Draft RFP Part 1	Deliberative Process	RIDOT_000054219-RIDOT_000054271
4/19/2024	Request for Proposal	RIDOT	None	None	Internal Draft RFP Part 2	Deliberative Process	RIDOT_000054272-RIDOT_000054411
2/17/2021	Email	Anthony Pompei	Anthony Cimaglia III	Ryan Salvas	Internal RIDOT Email regarding ROC No. 03 deobligation for review	Deliberative Process	RIDOT_000044439

12/20/2023	Email	Mary Vittoria Bertrand	Keith Gaulin	None	Internal Office Emails discussing how payment will be processed	Deliberative Process	RIDOT_000006168-RIDOT_000006172
Unknown Date	Text Message		Pam Cotter, Liz P. Lori Fiset, John Igliozzi, Esq., Director Alviti, 401-527-7385	None	Text Messages between RIDOT Employees and Counsel for RIDOT regarding Counsel providing legal advice	Attorney Client Privilege	RIDOT_000007661
1/18/????	Text Message		Pam Cotter, Liz P. Lori Fiset, John Igliozzi, Esq., Director Alviti, 401-527-7385, Bob Rocchio, Steven Pristawa	None	Text Messages between RIDOT Employees and Counsel for RIDOT regarding Counsel providing legal advice	Attorney Client Privilege	RIDOT_000007662
1/27/2024	Email	Lisbeth Pettengill	Andrea R Palagi, Charles St. Martin III	Matthew Sheaff, Olivia Darocha	Internal Office Emails related to internal questions regarding prior contractors work	Deliberative Process	RIDOT_000010411-RIDOT_000010413
8/6/1996	Correspondence	Peter A. DeSimone	None	None	Inter-office Memo regarding internal pending questions	Deliberative Process	RIDOT_000023090-RIDOT_000023091
7/25/1996	Correspondence	John B. McGee	Kazem Farhoumand, P.E.	Messrs. Capaldi, Parker, Fondi, Pilkington, DeSimone	Inter-office Memo regarding internal matters requiring clarification	Deliberative Process	RIDOT_000023100-RIDOT_000023101
12/6/2023	Email	Anthony Pompei	Anthony Mako	None	Internal Office Email regarding including others on the email thread	Deliberative Process	RIDOT_000040673
2/5/2024	Presentation	RIDOT	FHWA	none	Internal RIDOT Draft Presentation	Deliberative Process	RIDOT_000040687
1/24/2024	Email	James Isabella	Anthony Pompei, Anthony Jr, Gentry	Soderlund Steven; Raposa, David	Internal Office Email re emergency repairs for review by RIDOT team	Deliberative Process	RIDOT_000040730
1/24/2024	Attachment to email	James Isabella	Anthony Pompei, Anthony Jr, Gentry	Soderlund Steven; Raposa, David	Internal Office Email Attachments regarding emergency repairs for review by RIDOT team	Deliberative Process	RIDOT_000040731
1/24/2024	Attachment to email	James Isabella	Anthony Pompei, Anthony Jr, Gentry	Soderlund Steven; Raposa, David	Internal Office Email regarding emergency repairs for review by RIDOT team	Deliberative Process	RIDOT_000040732
1/24/2024	Attachment to email	James Isabella	Anthony Pompei, Anthony Jr, Gentry	Soderlund Steven; Raposa, David	Internal Office Email	Deliberative Process	RIDOT_000040751
12/14/2023	Correspondence	RIDOT	James M. Gallant Jr., P.E.	None	Internal Office Memo and Routing Slip circulated for internal review and approval by RIDOT	Deliberative Process	RIDOT_000040901
12/21/2023	Correspondence	Christopher S. Hart, P.E.	John Megrdichian	None	Internal Office Memo and Routing Slip circulated for internal review and approval by RIDOT	Deliberative Process	RIDOT_000041032-RIDOT_000041033
12/21/2023	Correspondence	Christopher S. Hart, P.E.	John Megrdichian	None	Internal Office Memo and Routing Slip circulated for internal review and approval by RIDOT	Deliberative Process	RIDOT_000041035-RIDOT_000041036
12/14/2023	Correspondence	James M. Gallant Jr., P.E.	John Megrdichian	None	Internal Office Memo and Routing Slip circulated for internal review and approval by RIDOT	Deliberative Process	RIDOT_0000041240-RIDOT_000041241
1/1/2024	Correspondence	RIDOT	RIDOT	None	Internal Office Document created for RIDOT personnel	Deliberative Process	RIDOT_000041246
1/1/2024	Correspondence	RIDOT	RIDOT	None	Internal Office Document created for RIDOT personnel	Deliberative Process	RIDOT_000041271
1/23/2024	Email	John Preiss	Christopher Hart, P.E., Keith Gaulin	None	Internal Office Email for consideration of contractor request	Deliberative Process	RIDOT_000041319
3/6/2022	Email	John Preiss	Keith Gaulin	None	Internal Office Email for consideration of contractor request	Deliberative Process	RIDOT_000041436
3/6/2022	Email	John Preiss	Keith Gaulin	None	Internal Office Email for consideration of contractor request	Deliberative Process	RIDOT_000041440
1/29/2024	Email	Dewei Meng	Keith Gaulin	Mary Vittoria Bertrand, John Preiss	Internal Office Email regarding LARSA model Review	Deliberative Process	RIDOT_000041712

1/26/2024	Attachment to email	VN Engineers, Inc	Jeff Klein, P.E.	None	Attachment to Internal Email Chain regarding LARSA Model Review	Deliberative Process	RIDOT_000041714
12/12/2023	Email	Anthony Pompei	Keith Gaulin	John Preiss	Internal Office Email regarding Post-tensioning testing options	Deliberative Process	RIDOT_000041761
10/19/2017	Email	Lori Fisette	Anthony Pompei; Anthony Marchetti	None	Internal Office Email regarding sub-contractor violation	Deliberative Process	RIDOT_000041954
8/22/2017	Email	Kristen Capaldi	Paul DelCioppio	Anthony Marchetti, Anthony Pompei	Internal Office Email regarding scheduling a meeting re final pricing for Cardi Corp.	Deliberative Process	RIDOT_000042482
9/13/2016	Email	Christopher Hart	Kenneth Buteau	Jan Bak	Internal Office Email discussing draft of comments from submissions related to 2016-CB-016	Deliberative Process	RIDOT_000042696
9/13/2019	Memo	Christopher Hart	George Chahine	None	Internal RIDOT Draft Document related to the comments from submissions related to 2016-CB-016	Deliberative Process	RIDOT_000042697

DATE & TIME	RECORD TYPE	AUTHOR	RECIPIENT	COPYEES	SUBJECT MATTER	PRIVILEGE	BATE NUMBERS
	Memo	RIDOT	RIDOT		Internal Handwritten Notes	Non-Responsive	RIDOT_000049285
	Memo	RIDOT	RIDOT		Internal Handwritten Notes	Non-Responsive	RIDOT_000049286
11/15/2017	Meeting Agenda	Dan Coffland, Paul DelCioppio	George Ley, Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr., Paul DelCioppop, Dan Coffland, Rick Macksound, Dillon Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapietro, Corey Richard	None	Project Status Meeting Minutes Agenda Copy	Handwritten, non-responsive margin notes redacted	RIDOT_000049331
1/5/2018	Correspondence	Nicholas A. Giardino	Kristen Capaldi	Stephen Ricci, Paul Del Cioppop, Dillon Fahey	Cost Breakdown	Handwritten, non-responsive margin notes redacted	RIDOT_000049440
11/14/2018	Meeting Agenda	Paul DelCioppio	George Ley, Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr., Paul DelCioppop, Dan Coffland, Rick Macksound, Dillon Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapietro, Corey Richard	None	Project Status Meeting Notes	Handwritten, non-responsive margin notes redacted	RIDOT_000049676-RIDOT_000049677
4/4/2018	Meeting Agenda	Paul DelCioppio	George Ley, Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr., Paul DelCioppop, Dan Coffland, Rick Macksound, Dillon Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapietro, Corey Richard	None	Project Status Meeting	Handwritten, non-responsive margin notes redacted	RIDOT_000049688
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000007717-RIDOT_000007723
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000007777
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000007778-RIDOT_000007784
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000007804-RIDOT_000007815
10/11/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000007822-RIDOT_000007828
2/9/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000007829-RIDOT_000007834

9/9/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000007835-RIDOT_000007841
9/13/2022	Email	Anthony Palombo	Anastasia Wachter	Loren Doyle, Linda Burke, Lori Fisette, Carlos Padilla, Brett Campos, Jim Primeau, James McGinn, Anthony Pompei, Louis Maccarone	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008661-RIDOT_000008667
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008876-RIDOT_000008882
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008885-RIDOT_000008890
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008915-RIDOT_000008921
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008922-RIDOT_000008928
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008929-RIDOT_000008940
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008943-RIDOT_000008949
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008950-RIDOT_000008956
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008959-RIDOT_000008970
1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000008995-RIDOT_000009001
4/12/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000009006-RIDOT_000009017



1/10/2022	Email	Anthony Palombo	Anastasia Wachter	Anthony Pompei, Louis Maccarone, James Primeau, James McGinn, Lori Fisette, Loren Doyle, Randy Warden, Carlos Padilla, Wilfred Hernandez	Internal Office Emails regarding unrelated bridges	Non-Responsive Materials	RIDOT_000009181-RIDOT_000009187
10/21/2024	Email	James Fitzpatrick	Anthony Pompei, Anthony Jr, Gentry	Kyle Ferreira	Internal Handwritten Notes	Non-Responsive	RIDOT_000025559
2/28/2024	Cost Details	Barletta Heavy Division, Inc.	RIDOT	None	Internal Handwritten Notes	Non-Responsive	RIDOT_000025610,RIDOT_000025612-000025613,RIDOT_000025615-RIDOT_000025616
6/14/2017	Meeting Agenda	Paul DelCioppio	George Ley, Anthony Pompei, Kristen Capaldi, Stephen Ricci, Sr., Paul DelCioppop, Dan Coffland, Rick Macksound, Dillion Fahey, Kevin Waters, Sean Corrigan, Nick Giardino, Lou Colapietro, Corey Richard	None	Project Status Meeting	Handwritten, non-responsive margin notes redacted	RIDOT_000049515,RIDOT_000049518
		David W. Fish P.E.	Steven A. Cardi	Beltram, Capaldi, Fisette, Fish, Iglozzi, Marchetti, Pompei	Post it note	Handwritten, non-responsive margin notes redacted	RIDOT_000049569-RIDOT_000049570
1/6/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	W. Flanders, PR, Chief Engineer- Construction Pilkington, Asst. Chief/Construction Operation Jobsite J. Pursche, CFO	Correspondence between ATENA and RIDOT	Personal Information - Social Security Numbers	RIDOT_000001081, RIDOT_000001083
4/11/1998	Timesheet	Joan Martel- AETNA Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001539-RIDOT_000001542
12/13/1997	Timesheet	Linda M Duffy - AETNA Bridge- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001543-RIDOT_000001544
9/13/1997	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001545-RIDOT_000001548
4/12/1997	Timesheet	Joan Martel - Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001549-RIDOT_000001552
4/5/1997	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001553-RIDOT_000001556
11/30/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001558-RIDOT_000001651
11/9/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001562-RIDOT_000001566
11/16/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001567-RIDOT_000001571
10/26/1996	Timesheet	Aetna Bridge Company	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001577-RIDOT_000001581
6/22/1996	Timesheet	Linda M Duffy- Aetna Bridge Company- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001582-RIDOT_000001587
5/11/1996	Timesheet	Linda M Duffy- Aetna Bridge Company- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001588-RIDOT_000001589
4/13/1996	Timesheet	Linda M Duffy - AETNA Bridge- Payroll Supervisor	RIDOT	None	Timesheet for ATENA Workers	Personal Information - Social Security Numbers	RIDOT_000001590-RIDOT_000001591
5/6/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer J. Pilkington, Asst. Chief/Const. Operations Jobsite	Correspondence between ATENA and RIDOT	Personal Information - Social Security Numbers	RIDOT_000001035,RIDOT_000001038,RIDOT_000001040, RIDOT_000001042

DATE & TIME	RECORD TYPE	AUTHOR	RECIPIENT	COPYEES	SUBJECT MATTER	BATE NUMBERS
3/5/1998	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	W. Flanders, PR, Chief Engineer- Construction Pilkington, Asst. Chief/Construction Operation Jobsite	1. Correspondence between ATENA and RIDOT	RIDOT_000000855-RIDOT_000000856
2/20/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite J. Pursche, CFO	Correspondence between RIDOT and AETNA	RIDOT_000001336-RIDOT_000001338
6/24/1996	Correspondence	Serafin Evora- EEO Compliance Officer- RIDOT	Joan Martel - EEO Officer- Aetna Bridge	J. McGee, J. Capaldi, C. Cherry, P. DeSimone (R.E.)	Correspondence between ATENA and RIDOT	RIDOT_000001411-RIDOT_000001414
11/20/2023	Correspondence	Barletta-Alena I-195 Washington Bridge North Phase 2 JV	RIDOT	None	Invoicing hours for the month of November 2023.	RIDOT_000002310-RIDOT_000002315
2/9/2024	Email	RIDOT- Anthony Pompei	Lori Fisette, Loren Doyle	Steven Soderlund	Internal Office Emails	RIDOT_000004288-RIDOT_000004289
4/20/2017	Email	Kristen Capaldi	Anthony Pompei	None	Internal Office Emails	RIDOT_000004388-RIDOT_000004389
12/16/2023	Email	Anthony Rotondo	Keith Gaulin, Carlos Padilla	John Preiss, Anthony Pompei, Anthony Palombo	Internal Office Emails	RIDOT_000004968-RIDOT_000004974
12/13/2023	Email	Paul McGuinness - Mbaker	Marc D'Amore, Keith Gaulin	Anthony Pompei, John Preiss	Internal Office Emails	RIDOT_000005233-RIDOT_000005239
12/14/2023	Email	Keith Gaulin	Anthony Pompei, John Preissm Corey Richard, Anthony Rotondo	Kristina Hanes, Joseph Allwarden, Dave Fish, Steven Soderlund	Internal Office Emails	RIDOT_000005541-RIDOT_000005543
11/3/2017	Email	Robert Rocchio	Peter Aliviti Jr, Shoshana Lew, David Fish, Loren Doyle	Georgette Chahine, Kieth Gaulin, David Clukey	Internal Office Emails	RIDOT_000005764-RIDOT_000005765
4/25/2017	Email	Kristen Capaldi	Paul DelCioppio	None	Internal Office Emails	RIDOT_000006336-RIDOT_000006338
12/15/2006	Correspondence	RIDOT	RIDOT	None	RFI Tracking Sheet	RIDOT_000014361
10/13/2010	Correspondence	Peter A. Healey, P.E. - Acting Chief Civil Engineer	Jean Boyle, Director, Department of Planning	Smith, Palumbo, Fish, Healey, Pavla, Gagnon, Hebert, Simpson, Emidy	Correspondence between RIDOT and Providence Preservation Society	RIDOT_000014456-000014459
11/25/1996	Correspondence	Dennis Ledo	Kazem Farhoumand, P.E. Managing Engineer, Bridge Design	Mr. Farhoumand	Letter of Transmittal	RIDOT_000014564
11/7/1195	Correspondence	Dennis Ledo	Kazem Farhoumand, P.E. Managing Engineer, Bridge Design	Mr. Farhoumand	Letter of Transmittal	RIDOT_000014631
12/15/2023	Correspondence	Elizabeth Correria - Senior Historic Preservation Specialist	Devon Kurtz, Executive Director, Blackstone Heritage Corridor, inc.	Begin, Byrne, Correia, Fahey, Palumbo, Soderlund	Data Sheet	RIDOT_000011044-RIDOT_000011046
10/28/2003	Correspondence	State of Rhode Island -Construction Unit	State of Rhode Island - Transportation	Chief Engineer	Inter-office Memo	RIDOT_000022483-RIDOT_000022485
5/30/1996	Correspondence	RI Department of Transportation	State of Rhode Island - Transportation	None	Daily Force Account Work Sheet	RIDOT_000022744-RIDOT_000022747
5/30/1997	Correspondence	State of Rhode Island -			Report of Change	RIDOT_000022774-RIDOT_000022775
7/30/1996	Correspondence	Kazem Farhoumand, P.E.	P. DeSimone	None	Letter of Transmittal	RIDOT_000023095-RIDOT_000023097, RIDOT_000023099
5/24/1996	Correspondence	Kazem Farhoumand, P.E.	John B. McGee	Messrs. Capaldi, Parker, Annarrumo,Jackvony,Boardman, Nickelson	Inter-office Memo	RIDOT_000023177-RIDOT_000023178
10/22/1996	Correspondence	RIDOT	RIDOT	None	Inspector Report of Daily Activity	RIDOT_000024393
2/2/2024	Email	Anthony Pompei	Jeanette Smith, Lizbeth Pettengill, Robert Rocchio, Fisette Lori, Loren Doyle	Steven Soderlund	Internal Office Email	RIDOT_000040685
1/25/2024	Email	John Preiss	Christopher Hart, P.E., Keith Gaulin	None	Internal Office Email	RIDOT_000040929
12/12/2023	Correspondence	Michael Murdock	William Rauseo, Jeff Klein	Thomas Da Lomba, Geoffrey Dilg	Internal Document	RIDOT_000041185
12/28/2023	Correspondence	Jeff Klein	RIDOT	None	Internal Document	RIDOT_000041206
1/25/2024	Correspondence	James Twomey	None	None	Internal Document	RIDOT_000042234-RIDOT_000042236

8/5/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer J. Pilkington, Asst. Chief/Const. Operations Jobsite	Correspondence between ATENA and RIDOT	RIDOT_00000585- RIDOT_00000589
10/8/1996	Correspondence	Phillip Kydd- Administrator	Joan Martel - EEO Officer- Aetna Bridge	J. Capaldi - Construction Operations L. Boisclair (R.E.), P. DeSimone (R.E.) E.Colantuono (R.E.) SER- jobs for Progress, J. Marcello (Tilcon Gammino)	Correspondence between RIDOT and AETNA	RIDOT_000001290- RIDOT_000001292
6/5/1996	Correspondence	Jeffrey A. Bostock - AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite	Correspondence between ATENA and RIDOT	RIDOT_000001431- RIDOT_000001435
9/5/1996	Correspondence	RIDOT	RIDOT	None	Internal Handwritten Notes	RIDOT_000024510
3/1/2024	Email	Nuno M. Vasconcelos	David Raposa; Andrew, Jr, Gentry; Lane, Tracy; Postle, Kenneth	None	Personal Information	RIDOT_000025686
5/17/2024	Pay Estimate Recap	Barletta Heavy Division, Inc.; AETNA	RIDOT	None	Internal Handwritten Notes	RIDOT_000025926, RIDOT_000025942, RIDOT_000025944-000025945, RIDOT_000025947- RIDOT_000025948
4/2/2024	Email	Anthony Pompei	James Fitzpatrick; Jeffrey Klein	Steve Pristawa; Steve Soderlund, Anthony Mako, Andrew, Jr. Gentry, Kyle Ferreira, George Lay, Jeff Bostock	Handwritten notes	RIDOT_000026029
1/31/2022	Certificate of Compliance	Liddell Leasing Corp	Barletta/AETNA I-195 Washington Bridge North Phase 2 JV	Notes	Handwritten notes	RIDOT_000031823
10/27/2021	Email	Bryan Blackerby	David Raposa	Anthony Pompei, Louis Maccarone, Michael Swift, David Raposa	Handwritten notes	RIDOT_000031858
10/21/2021	Meeting Agenda	RIDOT	Barletta/AETNA, VHB	None	Handwritten notes	RIDOT_000032334, RIDOT_000032336
12/1/2021	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	RIDOT_000032350- RIDOT_000032351, RIDOT_000032354
1/26/2022	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	RIDOT_000032364- RIDOT_000032367
5/4/2022	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	RIDOT_000032379- RIDOT_000032381
11/16/2022	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	RIDOT_000032424
1/25/2023	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	RIDOT_000032440, RIDOT_000032442
2/8/2023	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	RIDOT_000032444
4/5/2023	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	RIDOT_000032448, RIDOT_000032450
11/15/2023	Meeting Agenda	RIDOT	Barletta/AETNA JV	None	Handwritten notes	RIDOT_000032475- RIDOT_000032480
3/30/1988	Correspondence	Paul R. Annaummo, P.E. - Managing Engineer	Wendall J. Flanders - Chief Engineer	Capaldi, Parker, Annarummo, Corrao, DeAngelis, Pilkington, Carter	Inter-Office Memo	RIDOT_000000817- RIDOT_000000819
4/22/1997	Correspondence	Robert V. Atcherley- Superintendent- AETNA	Peter DeSimone- Resident Engineer - RIDOT	J. Capaldi, PE, Chief Engineer- J. Pilkington, Asst. Chief/Construction Operation Jobsite J. Pursche, CFO	Correspondence between RIDOT and AETNA	RIDOT_000001326, RIDOT_000001329, RIDOT_000001333, RIDOT_000001334
11/3/1995	Correspondence	Edmund T. Parker, Jr., P.E.	David A. Ferguson	Parker, Bennett, Smith, Farhoumand, Faraj, Consultant (Paul Jordan)		RIDOT_000014660
10/3/1995	Correspondence	Dennis Ledo	Internal RIDOT- Unknown	None		RIDOT_000014695, RIDOT_000014697
12/1/1995	Correspondence	Gilbert Pemberton, II	Paul M. Jordan, P.E.	K. Farhoumand- RIDOT, B. Patel- VHB. S.D. Morgan-NYNEX, J.A. Scunginom Jr. - RIDOT,		RIDOT_000014699- RIDOT_000014700
7/12/1993	Correspondence	The Commonwealth	RIDOT			RIDOT_000014862- RIDOT_000014880
6/13/2022	Email	Anastasia Wachter	Anthony Palombo	Lori Fisette, Anthony Pompei		RIDOT_000042826
6/10/2020	Routing Slip	David Clutley, PE	John Megrđichian	John Preiss		RIDOT_000045097

3/11/2020	Memo & Routing Slip	David Cluley, PE	John Megrdichian	John Preiss		RIDOT_000045102-RIDOT_000045103
12/3/2020	Email	David Cluley, PE	Monica Raposo,	Lisa Shervlin		RIDOT_000045118-RIDOT_000045119
3/29/2022	Memo & Routing Slip	David Cluley, PE	John Megrdichian	John Preiss		RIDOT_000045135-RIDOT_000045136
12/14/2023	Memo & Routing Slip	James M. Gallant Jr., P.E.	John Megrdichian	John Preiss & C. Hart		RIDOT_000045320-RIDOT_000045321
6/18/2023	Memo & Routing Slip	John Megrdichian	Christopher Hart, P.E.	John Preiss & C. Hart		RIDOT_000045326-RIDOT_000045327
2/15/1996	Correspondence	RIDOT	RIDOT	None		RIDOT_000046367-RIDOT_000046368
12/14/2010	Correspondence	Michael A. Hebert	David Fish, P.E.	None		RIDOT_000046991
5/24/1996	Correspondence	Robert V. Atcherley	Peter DeSimone	J.McGee, J.Pilkington		RIDOT_000047621
10/4/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo		RIDOT_000047981
11/14/1995	Correspondence	John McFee	Kazem Farhoumand, P.E.	Kazem Farhoumand, P.E.		RIDOT_000047982,RIDOT_000047984
11/6/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo, David Arnold		RIDOT_000048009-RIDOT_000048010
11/6/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo, David Arnold, Antonio P. Franco, Dr. Randall Poston		RIDOT_000048044
11/15/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	None		RIDOT_000048057,RIDOT_000048059
1/5/1996	Correspondence	Kazem Farhoumand, P.E.	Dennis Ledo, P.E.	None		RIDOT_000048240
7/17/2025	Checklist	Gentry Andrews, Jr.	Steven Soderlund, P.E.	Finals, Anthony Pompei		RIDOT_000048243
3/6/2024	Cost Details	Barletta Heavy Division, Inc	RIDOT	None		RIDOT_000049915-RIDOT_000049918
9/15/2015	Cost Details	AECOM, Aries, Commonwealth	RIDOT	None		RIDOT_000044533
2/8/2018	Cost Details	AECOM	RIDOT	None		RIDOT_000044870- RIDOT_000044871,RIDOT_000044881, RIDOT_000044884,RIDOT_000044888- RIDOT_000044891
12/7/2017	Cost Details	AECOM	RIDOT	None		RIDOT_000044985- RIDOT_000044987,RIDOT_000044991
8/19/2020	Cost Details	AECOM, Aries, Commonwealth	RIDOT	None		RIDOT_000045018- 000045019,RIDOT_000045024
9/10/2019	Invoice	AECOM	RIDOT	None		RIDOT_000045030- RIDOT_000045031,RIDOT_000045035,RIDOT_000045046,
4/20/1995	Correspondence	Paul M. Jordan, P.E.	Kazem Farhoumand, P.E.	Dennis Ledo		RIDOT_000045072,RIDOT_000045081
1/26/2024	Invoice	AECOM	RIDOT	None		RIDOT_000048429
5/16/2024	Payroll Summary	AECOM	RIDOT	none		RIDOT_000049861,RIDOT_000049863- RIDOT_000049875, RIDOT_000049877- RIDOT_000049883
2/8/2019	Correspondence	AECOM	RIDOT	None		RIDOT_000049897-RIDOT_000049898
5/4/2023	Routing Slip	Anthony Pompei	Lori Fisette	None		RIDOT_000011423-RIDOT_000011433
12/14/2023	Email	Steven Soderlund	Lori Fisette	None		RIDOT_000042858-RIDOT_000042859
12/14/2023	Email	Loren Doyle	Derek Torrey, Lori Fisette	None		RIDOT_000042960
						RIDOT_000042965

# EXHIBIT F

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**From:** Mellado, Chris  
**Sent:** Friday, October 3, 2025 4:01 PM  
**To:** 'ag@riag.ri.gov'; 'srice@riag.ri.gov'; 'Stephen N. Provazza'; 'js@savagelawpartners.com'; 'Michael Robinson'; 'Edward Pare III'; 'tleopold'; 'Leslie Mitchell Kroeger'; Diana Martin; 'Poorad Razavi'; Takisha Richardson; 'atoric@cohenmilstein.com'  
**Cc:** Blease, Jeffrey R.; Morris, Benjamin J.; 'Jeffrey B. Pine'; 'Jackson Parmenter'  
**Subject:** PC-2024-4526 - JV Discovery Deficiency Letter - Washington Bridge Litigation  
**Attachments:** JV Discovery Deficiency Letter to the State.pdf

Counsel,

Please find attached Barletta/Aetna I-195 Washington Bridge North Phase 2 JV's letter outlining deficiencies in the State's discovery responses.

We look forward to hearing from you and to working toward resolution of these matters.

Thank you,

**Chris Mellado**  
*Associate*

**Foley & Lardner LLP**  
301 E Pine St, Suite 1200, Orlando, FL 32801  
Phone 407.236.5868  
[View My Bio](#) | [Visit Foley.com](#) | [chris.mellado@foley.com](mailto:chris.mellado@foley.com)





111 HUNTINGTON AVE  
SUITE 2500  
BOSTON, MA 02199-7610  
617.342.4000 TEL  
617.342.4001 FAX  
[FOLEY.COM](http://FOLEY.COM)

WRITER'S DIRECT LINE  
617.226.3155  
[jblease@foley.com](mailto:jblease@foley.com)

October 3, 2025

**VIA E-MAIL**

Peter F. Neronha, Esq.  
Sarah W. Rice, Esq.  
Stephen N. Provazza, Esq.  
Assistant Attorneys General  
150 S. Main Street  
Providence, RI 02903  
[ag@riag.ri.gov](mailto:ag@riag.ri.gov)  
[srice@riag.ri.gov](mailto:srice@riag.ri.gov)  
[sprovazza@riag.ri.gov](mailto:sprovazza@riag.ri.gov)

Jonathan N. Savage, Esq.  
Michael P. Robinson, Esq.  
Edward D. Pare III, Esq.

SAVAGE LAW PARTNERS, LLP  
564 South Water Street  
Providence, RI 02903  
[js@savagelawpartners.com](mailto:js@savagelawpartners.com)  
[mrobinson@savagelawpartners.com](mailto:mrobinson@savagelawpartners.com)  
[epare@savagelawpartners.com](mailto:epare@savagelawpartners.com)

Theodore J. Leopold, Esq.  
Leslie M. Kroeger, Esq.  
Diana L. Martin, Esq.  
Poorad Razavi, Esq.  
Takisha Richardson, Esq.  
Adnan Toric, Esq.  
COHEN MILSTEIN  
11780 U.S. Highway One  
Suite N500  
Palm Beach Gardens, FL 33408  
[tleopold@cohenmilstein.com](mailto:tleopold@cohenmilstein.com)  
[lkroeger@cohenmilstein.com](mailto:lkroeger@cohenmilstein.com)  
[dmartin@cohenmilstein.com](mailto:dmartin@cohenmilstein.com)  
[prazavi@cohenmilstein.com](mailto:prazavi@cohenmilstein.com)  
[trichardson@cohenmilstein.com](mailto:trichardson@cohenmilstein.com)  
[atoric@cohenmilstein.com](mailto:atoric@cohenmilstein.com)

**RE: *State of Rhode Island v. AECOM Technical Services, Inc., et al.* Rhode Island Superior Court – Business Calendar C.A. No. PC-2024-04526**

**Notice of Deficiency in the State's Responses to the JV's Discovery Requests**

Dear Counsel:

Pursuant to Rule 37 of the Rhode Island Superior Court Rules of Civil Procedure, Defendant/Counter-Plaintiff Barletta/Aetna I-195 Washington Bridge North Phase 2 JV ("**JV**") has identified pervasive deficiencies in Plaintiff/Counter-Defendant, the State of Rhode Island's ("**State**") responses ("**Responses**") to the JV's discovery requests.

The discovery Responses at issue are:

1. The State's Response to the JV's First Request for Production of Documents
2. The State's Response to the JV's First Request for Admissions
3. The State's Response to the JV's First Interrogatories

4. The State's Response to the JV's Second Request for Production of Documents

5. The State's Response to the JV's Second Interrogatories

The State's September 2, 2025 Responses are deficient in both substance and form, including vague, incomplete, or evasive answers, generalized objections lacking factual or legal support, meritless specific objections, and inapplicable and unsupported privilege claims asserted without a privilege log.

The JV requests that the State agree by October 10, 2025, to provide complete supplemental responses to correct these issues and a full privilege log as outlined below within 15 days of this letter. If the State will not agree, the JV requests that the State meet-and-confer no later than October 10, 2025, to address these deficiencies and facilitate their prompt resolution. If the State does not provide timely and adequate supplementation, the JV will seek relief from the Court.

**I. THE STATE'S RESPONSES TO THE JV'S INTERROGATORIES**

**ROG No. 7:** In reference to AMENDED COMPLAINT ¶ 91, identify whether the BTC addressed the existence of problems relating to the tie-down rods at Piers 6 and 7 and called for repairs to the post-tensioning systems of the WASHINGTON BRIDGE. If so, please identify the specific BTC plan sheet number(s) and describe in detail the work the BTC required the JV to perform on the tie-down rods at Piers 6 and 7 and the WASHINGTON BRIDGE's post-tensioning systems.

**Response:** "In RFP Part 2, Section 3.13.7.1 Washington Bridge Rehabilitation, 'The overall goal of this project is to provide a 25-year design life for the rehabilitated structure; therefore, the DB Entity shall design and construct the bridge strengthening and rehabilitation with a minimum design life of 25 years.' The same section also goes on to state 'The Design Build Team is responsible for any required retrofit or strengthening required by their proposal to achieve the 25-year design life. The DB Entity shall develop models and prepare design calculations as necessary to show their proposed method or rehabilitation will achieve this requirement.

**Deficiency:** The State's response is non-responsive and evasive. The JV request sought a statement as to whether the BTC addressed problems with the tie-down rods at Piers 6 and 7 and called for repairs to the Washington Bridge's post-tensioning systems, along with the identification of specific BTC plan sheet numbers and a detailed description of that work. Rather than provide this information, the State's response cites generalized RFP contract language that simply restates the rehabilitation goal, language which itself directs the reader back to the BTC drawings, without identifying those drawings or describing the work they depict. This is circular and fails to answer the core of the request.<sup>1</sup>

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<sup>1</sup> Moreover, the State excerpts portions of RFP Part 2, Section 3.13.7.1 while omitting other portions of that **same section** that appear between the language it quoted in its answer. The State leaves out the sentences stating, "The BTC plans show one way to achieve this [25-year design life] using link slabs to eliminate as many deck joints as possible, preventing future deterioration of beam ends," as well as the subsequent directive, "It is not the intent of the project to replace bearings not explicitly shown on the BTC drawings." Both provisions directly link the general rehabilitation requirement quoted in the State's response to specific BTC drawings that the State prepared and provided, which goes to the heart of the JV's interrogatory.





The State did not object to this interrogatory; therefore, any objections are waived. A compliant, non-evasive supplemental response must be provided.

**ROG No. 8:** Is YOUR response to each request for admission in the JV's First Requests for Admissions to RIDOT, dated June 13, 2025, an unqualified admission? If not, for each response that is not an unqualified admission:

- a. State the number of the request;
- b. State all facts on which you base YOUR response;
- c. State the names, addresses, and telephone numbers of all persons who have knowledge of those facts; and
- d. Identify all DOCUMENTS and other tangible things that support YOUR response and state the name, address, and telephone number of the person who has each DOCUMENT or thing.

**Response:** See RFA Responses.

**Deficiency:** The State's response is non-responsive. The interrogatory requires the identification of each request not admitted without qualification, the facts supporting each such response, the persons with knowledge of those facts, and the documents or tangible things supporting the responses, along with who possesses them. The State's answer provides none of this information. Merely referring to the RFA responses, which are themselves deficient and do not provide the detail requested by ROG No. 8, does not fulfill the interrogatory's requirements and deprives the JV of the information it is entitled to obtain.

The State did not object to this interrogatory; therefore, any objections are waived. A compliant, non-evasive supplemental response must be provided related to RFAs 1-8 and 11-48, which were not responded to with unqualified admissions.

## **II. THE STATE'S RESPONSES TO THE JV'S REQUESTS FOR ADMISSION**

### **1. DEFICIENT, NONRESPONSIVE PARTIAL ANSWERS**

The State's Responses to RFA Nos. 2, 3, 4, 11, and 12 state "Admitted in Part" or "Partially Admitted" but fail to specify which portion of the request is admitted and which portion is denied. Rhode Island Superior Court Rules of Civil Procedure 36(a) provides:

A denial shall fairly meet the substance of the requested admission, and when good faith requires that a party qualify an answer or deny only a part of the matter of which an admission is requested, the party shall specify so much of it as is true and qualify or deny the remainder.

For example, RFA No. 3 states: "Admit that the 2021 RFP did not provide DESIGN-BUILD PROPOSERS the LICHTENSTEIN REPORT." RFA No. 4 states: "Admit that RIDOT did not disclose the LICHTENSTEIN REPORT to the DESIGN-BUILD PROPOSERS." These are straightforward requests; either the State did or did not provide the Lichtenstein report in the 2021 RFP or to the design-build proposers. Yet, by responding "Admitted in Part" to both RFAs, the

State fails to “specify so much of [the matter] as is true” and therefore does not comply with Rule 36(a). The State must provide supplemental responses that clearly identify the portion admitted and the portion denied.

## 2. UNEXPLAINED OBJECTIONS

The State’s Responses to RFA Nos. 18, 19, and 21 assert “Objection. Vague and Ambiguous” but do not identify what portion of the request is claimed to be vague or ambiguous. Rhode Island Superior Court Rules of Civil Procedure 36(a) provides: “If objection is made, the reasons therefor shall be stated.” Here, the stated objection fails to articulate the reasons, as required by the rule, leaving the basis unclear. The State must amend its Responses to identify the exact language challenged and explain why it is vague or ambiguous, or withdraw the objections and completely respond to the RFAs.

Additionally, in Response to RFA No. 14, the State objects to the phrase “advance the BTC” as vague and ambiguous, yet the State uses that same language without qualification in Response 26 (“the RFP required the Design Build team to do any independent analysis to **advance the BTC** to a minimum 25-year design life...”). This inconsistency undermines the objection and suggests the term is sufficiently understood to provide a substantive admission or denial. Therefore, a supplemental response is required, or the State must define the alleged vague term and respond in that context.

## 3. IMPROPER ADDITION OF ARGUMENT

The State’s Responses to RFA Nos. 15, 16, and 17 admit the requested fact but then qualify the response with argumentative commentary, creating ambiguity as to the scope of the admission. Rule 36(a) requires admissions or denials that fairly meet the substance of the request. The State’s argumentative narrative is not proper in answering requests for admission. These responses must be amended to state the admission clearly, and any supplementary commentary should be removed. Otherwise, the State is obligated to respond to the portion of JV ROG No. 8, as these responses are not unqualified admissions.

# III. STATE’S RESPONSES TO THE JV’S REQUESTS FOR PRODUCTION

## 1. THE STATE CANNOT SHIELD INFORMATION FROM DISCOVERY BASED ON THE DELIBERATIVE PROCESS PRIVILEGE

The State invokes the deliberative process privilege in nearly all its Responses. See Responses to RFP Nos. 1–4, 6–7, 10–13, 15–42, and 46–52. Rhode Island law provides that this privilege serves a narrow application not applicable to the facts underlying this litigation. The State cannot rely on the deliberative process privilege in this case when it has placed its decisions regarding the Washington Bridge at issue by filing this action. Thus, these objections must be withdrawn, and supplemental and unredacted documents produced.

The deliberative process privilege ‘rests on a policy of affording reasonable security to the decision-making process within a government agency.’ The privilege precludes from disclosure ‘documents reflecting advisory opinions,

recommendations, and deliberations compromising a process by which governmental decisions and policies are formulated.’

*Rhode Island Economic Development Corp. v. Wells Fargo Securities, LLC*, No. PB125616, 2014 WL 3407982, at \*2 (R.I.Super. July 07, 2014) (internal citations omitted).

Courts consider a two-prong analysis in determining whether privilege applies to a specific document; namely:

whether the document was both ‘pre-decisional’ and ‘deliberative.’ “A document is pre-decisional if it is ‘prepared in order to assist an agency decisionmaker in arriving at his decision.’” Further, a document is “deliberative such that it ‘makes recommendations or expresses opinions on legal or policy matters.’”

*Id.* (internal citations omitted). While significant defects exist with the State’s only privilege log (discussed below), many of the State’s logged documents post-date the decisions they purportedly relate to, such as decisions to procure projects involving inspection or rehabilitation. Others are purely administrative or informational, prepared after relevant decisions were made. For example:

- **RIDOT\_000003165–RIDOT\_000003169**: Heavily redacted yet consisting of a routine RIDOT Daily Activity Report from August 15, 2023.
- **RIDOT\_000003424–RIDOT\_000003427**: Meeting minute dated March 3, 2023 between the JV and the State during the then ongoing 2021 Design-Build Project, which reflect project status.
- **RIDOT\_000011423–RIDOT\_000011433**: AECOM invoice voucher from January 31, 2019 and regarding a State Bridge Inspection.

None of these examples demonstrates a connection to a specific, identifiable decision-making process pending at the time.

Even if pre-decisional (which they are not), the State’s documents largely contain factual data, none of which reveal advisory opinions, recommendations, or subjective evaluations directed toward policy formulation. Additional examples include:

- **RIDOT\_000010411–RIDOT\_000010413**: Internal email forwarding a Providence Journal news article under the subject line “Fw: Cardi?”.
- **RIDOT\_000004388–RIDOT\_000004389**: Email exchange in connection with Cardi’s work on the Washington Bridge North, dated April 20, 2017, with the subject “RE: catwalk”.
- **RIDOT\_000004816–RIDOT\_000004822**: Email exchange, dated December 16, 2023, including the FHWA and in connection with the JV’s emergency repair design.

*Wells Fargo* further makes clear that “even if a document is both ‘pre-decisional’ and ‘deliberative,’ the privilege will not apply when an agency places its deliberations at issue.” *Id.* at 3. Here, the State has done precisely that by initiating this litigation, naming the JV and remaining co-defendants, and affirmatively putting the State’s own decision-making processes in question. The claims asserted necessarily invite scrutiny of what the State considered, discussed, and decided



in connection with the projects at issue. By doing so, the State has waived any ability to shield from discovery the very materials that illuminate those deliberations. Courts recognize that a party cannot wield its internal decision-making as both a sword and a shield, relying on it to prosecute claims while blocking access to information central to the defense. *Id.* (ruling that the government agency's "claim of [deliberative process] privilege is inappropriate" because their decision-making was placed "at issue" in the case.)

Moreover, each of the JV's discovery requests to which the State asserts the deliberative process privilege seeks documents that are central to both the State's claims against the JV. These matters are indisputably "at issue." Examples include:

- Documents and communications concerning the Lichtenstein report that the State withheld from the JV and other proposers. See RFP Nos. 13 and 35.
- Documents and communications concerning the 2021 Design-Build Project between the State and the JV, including the State's review, approval, or concurrence with the JV's Washington Bridge rehabilitation plans. See RFP No. 10; see also RFP Nos. 1-4, 6, 7, and 11 (project-related communications).
- Documents and communications regarding the State's specific allegations in its amended complaint against the JV. See RFP Nos. 12 and 15-17.
- Communications among specifically identified State personnel regarding the design, construction, maintenance, or assessment of the Washington Bridge. See RFP Nos. 21-27.
- Inspection-related documents in connection with the Washington Bridge. See RFP Nos. 31-33.
- Photographs or videos of the Washington Bridge. See RFP No. 34.
- Documents and communications from the State's 2014 procurement process for design services on the Washington Bridge, which demonstrate that the State was already focused on rehabilitating the bridge years before the events at issue. See RFP Nos. 36-42.

Because the State put its decision-making at issue in this case, the State's withholding of an undisclosed volume of responsive documents under the label of "deliberative process" underscores both the overreach in asserting this privilege and the resulting prejudice to the JV. By blocking access to evidence that goes to the core of the State's claims, the State is improperly using the privilege as a litigation tactic rather than a narrowly drawn protection permitted under Rhode Island law. Supplemental responses and production of all documents withheld or redacted on this basis must be provided.

## **2. THE STATE'S IMPROPER AND UNSUBSTANTIATED ASSERTION OF PRIVILEGES; DEFICIENT PRIVILEGE LOG AND LACK OF UPDATED PRIVILEGE LOG**

The State's RFP responses consistently assert various privilege objections without identifying the specific documents withheld or producing a log sufficient for the JV to evaluate those claims. Rhode Island Superior Court Rule of Civil Procedure 26(b)(5) and the ESI Protocol require that a party expressly state each privilege claimed and provide a detailed privilege log that enables the requesting party to assess the validity of any privilege claimed.

In nearly every instance where the State improperly invokes the deliberative process privilege, approximately 45 out of 52 document requests (or 87% of its Responses), it also claims attorney-client privilege, work-product protection, and protections for non-testifying experts. Yet, the only privilege log the State provided pertains to redacted documents already produced and Bates-stamped. Its log and Responses do not identify any documents withheld in their entirety or withheld as expert material, nor do they clarify whether such documents even exist. This lack of transparency prevents the JV from meaningfully evaluating the State's privilege assertions or the completeness of the State's Responses and production.

The State's sole privilege log, dated April 1, 2025, only covers Bates range RIDOT\_000000001 through RIDOT\_000014962, despite multiple subsequent productions now running through RIDOT\_000050806. The productions are also riddled with additional unexplained redactions. The State must immediately produce a privilege log covering the entirety of its production.

Further, the April 1, 2025 log is itself deficient because:

- It omits the "File Name" metadata field, required by ESI Protocol Section E; and
- It improperly designates documents as withheld for privilege because they allegedly contain "personal information" or "non-responsive materials." Neither is a valid basis for assertion of privilege.

The State must cure the deficiencies in its April 1, 2025 privilege log and produce a supplemental log covering the entirety of its Responses and document production, including any non-produced documents it has withheld. The log shall be populated with all required metadata fields and accompanied by descriptions sufficient to permit the JV to assess the validity of each claimed privilege. Finally, documents improperly withheld based on the deliberative process privilege, or as nonresponsive or containing personal information, shall be removed from the log and produced without redactions.

### **3. BOILERPLATE OBJECTIONS AND FAILURE TO PRODUCE RESPONSIVE DOCUMENTS**

For Responses Nos. 19 through 27, which seek targeted communications with specific State employees and entities who worked on the Washington Bridge, the State asserts meritless generic, boilerplate objections (e.g., "overly broad," "unduly burdensome," "not reasonably calculated to lead to the discovery of admissible evidence") without stating with specificity the grounds for objection, or confirming documents will be produced or are being withheld. Rhode Island Superior Court Rules of Civil Procedure 34(b) provide:

The response shall state, with respect to each item or category, that inspection and related activities will be permitted as requested, unless the request is objected to, in which event, the reasons for objection shall be stated. If objection is made to part of an item or category, the part shall be specified.

The State's boilerplate objections fail to meet the rule's requirement to provide the *reasons* for the objection. The State further notes: "Discovery is ongoing, and the Plaintiff reserves the right to amend this Response pending the outcome of further investigation and discovery", without



stating whether or when any responsive documents will be produced. This vague reservation of rights, coupled with boilerplate objections and no production, deprives the JV of the targeted communications sought. The State must amend its responses to remove boilerplate objections, clearly state any specific grounds for objection, and produce all non-privileged documents responsive to RFP Nos. 19–27.<sup>2</sup>

A similar deficiency pattern appears in other requests:

- **Response Nos. 6 and 10:** Contains the same boilerplate objections and “discovery is ongoing” language as RFPs 19–27, without stating specific grounds or whether responsive documents will be produced.
- **Response No. 14:** Contains no objections but produces nothing, stating only that “discovery is ongoing.”
- **Response No. 8:** The State provides no objection but produces nothing, stating only that “discovery is ongoing.” RFP No. 8 is a specific request seeking a copy of RIDOT’s risk matrix for the 2021 Design-Build Contract; a central document likely addressing project risks, responsibilities, and contingencies. Given the targeted nature and importance of this request to the claims and defenses in this matter, the failure to produce it despite no objection is a glaring deficiency and must be promptly remedied.

The State’s effort to hide the ball with these types of evasive responses is a misuse of the discovery process. Supplemental responses (1) withdrawing the meritless objections or (2) stating what documents are being withheld and on what basis are required. The supplemental responses must also confirm whether the State will produce documents in response to each RFP.

#### 4. INCOMPLETE OR NON-RESPONSIVE PRODUCTIONS

For several Responses, the State claims to have met the request by referring to produced Bates-numbered documents, but the cited material is incomplete, non-responsive, or otherwise fails to capture the full scope of each request. In each instance, the production falls short:

- **Response No. 2:** Only includes copies of Requests for Proposals 1 through 3. Fails to identify or produce the underlying documents, addenda, Q&As, related communications, or appendices provided to design-build proposers.
- **Response. 4:** Contains materially incomplete communications to the proposers.
- **Response. 5:** Does not include any proposals submitted in response to the 2021 RFP other than the JV’s proposal.
- **Response. 9:** Contains only the “Notice of Contract Purchase Agreement” and not the complete 2021 Design-Build Contract.
- **Response No. 10:** Cites a previously produced folder labeled Barletta/AETNA but fails to produce or identify responsive documents and communications related to RIDOT’s review, approval, or concurrence with the JV’s rehabilitation plans, including comment resolution forms, RIDOT transmittals, and certificates of compliance.

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<sup>2</sup> This analysis applies to all Responses containing boilerplate objections or the “discovery is ongoing” reservation of rights without stating specific grounds or committing to production.

- **Response. 33:** Includes many documents unrelated to inspection costs after December 11, 2023 (e.g., meeting minutes from 2021), and omits responsive documents addressing inspection-related expenditures.
- **Response Nos. 35–42:** The State cites the range RIDOT\_000014963–RIDOT\_000018082 for each response, which is materially incomplete. Notably absent are:
  - Communications between or among the Technical Evaluation Committee (“TEC”);
  - Communications between the TEC and proposers;
  - Documents reflecting evaluation of proposals submitted in response to Bid #7461338;
  - Documents related to the Technical Selection Criteria (as predefined in the JV’s RFP); and
  - Documents related to the TEC’s “Final Selection” recommendation.

Across these requests, the State’s productions omit central categories of documents called for by each RFP. Rule 34(b) requires the responding party to produce all documents in its possession, custody, or control that are responsive to the request, or state with specificity the reasons for non-production. The State must amend its responses to provide the complete scope of responsive materials for each request listed above and produce the documents it appears to have withheld.

## 5. DEFICIENT PRODUCTION FORMAT AND METADATA ISSUES

In addition to the specific deficiencies detailed above, the State’s productions suffer from systemic format and metadata issues that impede the JV’s ability to review, search, and assess the materials provided. Non-exhaustive examples of these deficiencies are identified below:

1. We have identified at least 150 emails produced without metadata. The ESI Protocol requires email metadata to be produced. See RIDOT\_000002483, RIDOT\_000003253, RIDOT\_000004656, and RIDOT\_000004683.
2. Production of more than 1,000 PDFs without metadata and with unexplained, non-descriptive file names (e.g., file name consisting solely of a DOC number), which prevents meaningful identification or searchability. See RIDOT\_000000001 and RIDOT\_000022354.
3. Unexplained redactions appearing within productions, with no accompanying metadata identifying the redacted documents, as required, to enable assessment of the basis for each redaction. See RIDOT\_000042234 and RIDOT\_000041761.
4. Inconsistent application of the “Confidential” designation, with some documents branded as confidential in their content but lacking corresponding metadata indicating confidentiality. See RIDOT\_000000585, RIDOT\_000000817, and RIDOT\_000001557.

These deficiencies violate the requirements of the ESI Protocol and undermine the usability of the production data. The JV requests an explanation of the production method or corrected metadata from the State, specifically for the “File Names,” “Confidentiality,” and “Has Redactions” fields.



#### IV. CONCLUSION

The State's failure to provide complete and non-evasive responses to the JV's discovery, coupled with misapplication of the deliberative process privilege, unsupported assertion of other privileges, deficient privilege log, boilerplate objections, and defects in the production format, has prejudiced the JV and is a misuse of the discovery process. By withholding responsive documents and obscuring key information, the State is impairing the JV's ability to develop the facts, prepare its claims, and defend against the State's allegations.<sup>3</sup> Supplemental responses to address these defects must be provided.

Sincerely yours,

*/s/ Jeffrey R. Blease*

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**Jeffrey R. Blease**  
**Benjamin J. Morris**  
**Christopher D. Mellado**

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<sup>3</sup> The deficiencies set forth herein are non-exhaustive as the JV's review of the State's productions and responses is ongoing.



# EXHIBIT G

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**From:** Takisha Richardson  
**Sent:** Friday, October 31, 2025 9:58 AM  
**To:** Mellado, Chris  
**Cc:** Braisy Ruiz; Edward Pare III; rhodeislandbridgez12152322@cohenmilstein.filevineapp.com  
**Subject:** State's Response to JV's Deficiency Letter Dated 10/3/25  
**Attachments:** Reply to JV's Deficiency Letter dated. 10.3.25.pdf

**\*\*\* EXTERNAL EMAIL MESSAGE \*\*\***

Good afternoon, Chris,

Please see the attached letter in advance of our call.

**Takisha Richardson**  
Attorney

**COHENMILSTEIN**

**Cohen Milstein Sellers & Toll PLLC**  
11780 U.S. Highway One | Suite N500  
Palm Beach Gardens, FL 33408  
phone | direct 561.515.1400

*This e-mail was sent from Cohen Milstein Sellers & Toll PLLC. It may contain information that is privileged and confidential. If you suspect that you were not intended to receive it, please delete it and notify us as soon as possible.*

Takisha Richardson  
O: 561.515.1400  
D: 561.515.2611  
TRichardson@cohenmilstein.com

October 30, 2025

**Re: State of Rhode Island v. AECOM, et.al – JV's  
Discovery Deficiency Letter dated October 3, 2025**

Dear Counsel:

Thank you for your correspondence. Please see below the State's responses to the categories of documents outlined in your letter:

**A. Deficient Production Format and Metadata Issues**

- We disagree with your assertions. At the time of the State's production to the JV's requests, no ESI protocol governing its production had been finalized. Despite this fact, the State produced all documents in accordance with its proposed protocol. The issues flagged in your letter are easily explained.
  - **1 and 2** are all hard-scanned documents. Under the ESI protocol pending before the Court, this data is not required for these files. It is also worth noting that productions of ESI are still forthcoming and will be produced once the Court finalizes its Order.
  - **3** - Again, our productions to date have been provided before the finalization of a protocol. What has been produced was done using the standard metadata. We will provide an overlay with agreed metadata across all productions moving forward.
  - We utilized black box redactions. Moving forward, we agree to use text redactions to indicate whether the information is being redacted for privilege or privacy reasons.
  - **4** - Will be amended by providing an updated DAT file.

**B. Deliberative Process Privilege/Requests for Production**

- While we disagree with your assertion that the State has waived its ability to assert the deliberative process privilege over some of its documents, we have indicated to other Defendants that we are internally reviewing assertions we have made and will

October 30, 2025

Page 2

provide supplemental responses noting our intent to maintain our objections or withdraw as to some items and produce the previously withheld documents. Furthermore, the State, in its response to produce, noted its objections, while, where applicable, indicated that discovery is ongoing and relevant documents not protected by privilege will be produced. This production will be made by November 18, 2025. Additionally, an updated privilege log will be provided by November 13.

C. State's Responses to the JV's Requests for Admissions

- The State is not in agreement that its responses to the JV's RFAs are improper.
  - 2,3,4,11 and 12 – In each of these responses, the State indicates that part of the Request is admitted and further provides its basis for having denied the remainder of the Request. For example, in response to Request 3, the State indicates in part that “relevant information, including prior reports, was available to all proposers upon request”. The inclusion of this explanation is indicative that the first part of the State's response – Admitted in Part relates to the JV's request for admission that the Lichtenstein Report was not provided, with the caveat that it was, however, available upon request. Our team will provide a final response by November 18, 2025, indicating whether we believe any supplementary answers are required for these requests.
- Responses to 15, 16, 17, 18,19, and 21
  - Again, the State disagrees that its answers don't comport with the rules governing its admissions; however, our team will provide a final response by November 18, 2025, indicating whether we believe any supplementary answers are required for these requests.

D. State's Responses to the JV's Interrogatories

- The State disagrees that its answers are non-responsive and evasive. However, to resolve this matter, the State is considering whether further response is required. A final answer on the State's position will be provided by November 18, 2025.

We look forward to working to resolve these matters further.

Sincerely,

*Takisha Richardson*