

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

STATE OF RHODE ISLAND,

Plaintiff,

v.

AECOM TECHNICAL SERVICES, INC., *et al.*,

Defendant.

C.A. No. PC-2024-04526

HEARING DATE: 1/6/26

**DEFENDANT AECOM TECHNICAL SERVICES, INC.'S MOTION TO COMPEL
ANSWERS TO INTERROGATORIES AND REQUEST TO REMOVE THE
INTERROGATORY CAP UNDER RULE 33(b)**

Defendant AECOM Technical Services, Inc. ("AECOM"), pursuant to Rules 26, 33, and 37 of the Rhode Island Superior Court Rules of Civil Procedure, respectfully moves this Honorable Court for an Order compelling Plaintiff, the State of Rhode Island ("State"), to withdraw its objections under Rule 33(b) and provide full and complete, substantive responses to AECOM's Interrogatories.

AECOM also requests that the Court exercise its authority under Rule 33(b) to expand the numerical limit on interrogatories to a number that the Court deems proper, but to an amount not less than seventy-five (75) interrogatories, based on the extraordinary scope, complexity, and multi-decade nature of this litigation.

WHEREFORE, for the reasons set forth in its accompanying Memorandum of Law, AECOM respectfully requests that the Court:

1. Overrule the State's Rule 33(b) counting objection and compel the State to provide full and complete substantive responses to AECOM's Interrogatories Nos. 8–29 within 14 days;

2. Compel the State to provide amended full and complete substantive answers to Interrogatories Nos. 1-7 within 14 days;
3. Expand or remove the interrogatory limit for good cause under Rule 33(b) to at least seventy-five (75) interrogatories or more as the Court deems appropriate; and
4. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

AECOM TECHNICAL SERVICES, INC.

By Its Attorneys,

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Dated: December 18, 2025

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2025, I electronically filed and served this document through the electronic filing system on all counsel of record.

The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Amanda R. Prosek

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