

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 STATE OF RHODE ISLAND'S RESPONSES TO DEFENDANT JACOB
ENGINEERING INC.'S FIRST SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rule 34 of the Superior Court Rules of Civil Procedure, now comes the Plaintiff, State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following Responses to Defendant Jacobs Engineering Inc.'s First Request to Produce dated September 19, 2025:

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**STATE'S RESPONSES TO JACOBS' REQUEST FOR PRODUCTION DATED
SEPTEMBER 19, 2025**

1. All documents relating to the design or construction of the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000050807. Furthermore, discovery is ongoing, and investigation continues.

2. All documents relating to the inspection or assessment of the Washington Bridge, including but not limited to, all inspection reports and underlying materials supporting the same.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

3. All documents relating to the maintenance of the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states

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that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

4. All documents relating to the repair or rehabilitation of the Washington Bridge, including but not limited to, all documents related to any decisions to forego repairs or rehabilitation.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

5. All documents relating to the closure of the Washington Bridge in December 2023.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

6. All reports, analyses, assessments, evaluations, or other documents relating to the condition, capacity, or structural integrity of the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the

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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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

7. All load rating reports, analyses, assessments, or other similar documents for the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

8. All reports, analyses, assessments, or other similar documents for fracture critical members or non-redundant steel tension members for the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

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9. All material testing reports, analyses, assessments, or other similar documents for the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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. Plaintiff further objects to this request because it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001–RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

10. All reports, analyses, assessments, or other similar documents for agency defined elements for the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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. Plaintiff further objects to this request because it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001–RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

11. All contracts and agreements between Jacobs and the State relating to the Washington Bridge, including but not limited to, all contracts and agreements relation to Jacobs' 2021 inspection of the Washington Bridge and the "2019 inspection contract" referenced in paragraph 169 of the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, deliberative

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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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000017733-RIDOT_000017779; RIDOT_000017780-RIDOT_000017786; RIDOT_000017787-RIDOT_000018082. Discovery is still ongoing, and investigation continues.

12. All documents relating to Jacobs' 2021 inspection of the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000017733-RIDOT_000017779; RIDOT_000017780-000017786; RIDOT_000017787-000018082; RIDOT_000034735-000034736; RIDOT_00003624; RIDOT_00003625; RIDOT_000034737; RIDOT_000034738-RIDOT_000034739; RIDOT_000034740-RIDOT_000034741; RIDOT_000034746; RIDOT_000064830- RIDOT_000064869; RIDOT_000034747-RIDOT_000034759; RIDOT_000034760-RIDOT_000034774; RIDOT_000034775-RIDOT_000034780; RIDOT_000034781. Additionally, please see Defendant specific folder for Jacobs', previously produced. Furthermore, discovery is ongoing, and investigation continues

13. All documents that were provided or made available to Jacobs in connection with Jacobs' 2021 inspection of the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states

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that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

14. All documents that Jacobs provided or made available to the State in connection with Jacobs' 2021 inspection of the Washington Bridge, including but not limited to, Jacobs' inspection report and the underlying materials supporting the same.

RESPONSE: See Bates: RIDOT_000017733-000017779; RIDOT_000017780-000017786; RIDOT_000017787-000018082; RIDOT_000034735-000034736; RIDOT_000003624; RIDOT_000003625; RIDOT_000034737; RIDOT_000034738-000034739; RIDOT_000034740-000034741; RIDOT_000034746; RIDOT_000064830-RIDOT_000064869; RIDOT_000034747-000034759; RIDOT_000034760-000034774; RIDOT_000034775-000034780; RIDOT_000034781. Additionally, please see Defendant specific folder for Jacobs', previously produced. Furthermore, discovery is ongoing, and investigation continues.

15. All documents relating to amounts paid to Jacobs in connection with Jacobs' 2021 inspection of the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Additionally, please see Defendant specific folder for Jacobs', previously produced. Furthermore, discovery is ongoing, and investigation continues.

16. All documents relating to the Washington Bridge's post-tensioned cantilever beams and post-tensioning system, including but not limited to, all documents relating to the deterioration of such beams and system.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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

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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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Additionally, please see Defendant specific folder for Jacobs', previously produced. Furthermore, discovery is ongoing, and investigation continues.

17. All documents relating to the Washington Bridge's tie-down rods, including but not limited to, all documents relating to the tie-down rods failing, fracturing, or otherwise being compromised.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Additionally, please see Defendant specific folder for Jacobs', previously produced. Furthermore, discovery is ongoing, and investigation continues.

18. All policies, procedures, guidelines, instructions, requirements, protocols, and other similar documents related to the inspection, repair, or rehabilitation of the Washington Bridge, including but not limited to, all such documents governing Jacobs' 2021 inspection of the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

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19. All photographs and videos of the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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. Plaintiff further objects to this request because it is overly broad and unduly burdensome. Subject to and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

20. The original design plans, specifications, structural calculations, shop drawings, and other similar documents for the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000051143– RIDOT_000051313. Furthermore, discovery is ongoing, and investigation continues.

21. All inspection, maintenance, and repair documents related to the Washington Bridge, including but not limited to, repair records, inspection reports, condition assessments, safety evaluations, compliance certificates, service records, work orders, maintenance schedules, inspection checklists, daily reports, weekly reports, monthly reports, and time sheets.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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

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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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

22. All documents relating to budgets or estimates for inspection, maintenance, repair, or rehabilitation costs associated with the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

23. All documents relating to inspection, maintenance, repair, or rehabilitation costs that were incurred for the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

24. All documents relating to the Lichtenstein Report referenced in the Amended Complaint.

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RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000012781-RIDOT_000012839; RIDOT_000014963-RIDOT_0000018082. Furthermore, discovery is ongoing, and investigation continues.

25. All documents relating to the 1996–1998 rehabilitation of the Washington Bridge referenced in the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

26. All documents relating to or supporting paragraphs 46–65 in the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000012781-RIDOT_000012839; RIDOT_000014963-RIDOT_0000018082; RIDOT_000063199-RIDOT_000063429;

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RIDOT_000062946-RDOT_000063198; RIDOT_000062593-RIDOT_000062846.
Additionally, please see Defendant specific folder for AECOM, previously produced. Furthermore, discovery is ongoing, and investigation continues.

27. All documents relating to the Cardi Corporation Contract referenced in the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Additionally, please see Defendant specific folder for Cardi, previously produced. Furthermore, discovery is ongoing, and investigation continues.

28. All documents relating to or evidencing the "known deteriorating condition of the Washington Bridge" as alleged in paragraph 71 of the Amended Complaint, including but not limited to, documents establishing when such conditions was first known to the State.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

29. The inspection contracts and inspection reports, including all underlying materials supporting the same, referenced in paragraph 74 of the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, deliberative

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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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

30. All documents relating to or supporting paragraphs 76–91 in the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256; RIDOT_000015150-RIDOT_000015178; RIDOT_00003804-RIDOT_000063851. Additionally, see Defendant specific folder for AECOM and JV, previously produced. Furthermore, discovery is ongoing, and investigation continues.

31. All documents relating to or supporting the alleged “existence of unaddressed voids, poor grout, moisture, and corrosion, resulting in widespread deterioration of the post-tensioning system,” as alleged in paragraph 95 of the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are

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identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

32. All documents relating to alleged wear and tear damage to the Eastbound Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

33. All documents relating to work candidates or repair recommendations for the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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. Plaintiff further objects to this request because the term work candidates is vague, ambiguous, and undefined, but will respond with the understanding that the term work candidate means the identification of an opportunity to perform maintenance work on the Washington Bridge. Subject to and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

34. An inspection of all tie-down rods that were previously in the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, deliberative

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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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

35. An inspection of all post-tensioned cantilever beams that were previously in the Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

36. All documents relating to Wiss, Janney, Elstner Associates, Inc.'s ("WJE") April 5, 2024 report concerning the Washington Bridge, including but not limited to, all documents referenced in such report, all documents WJE reviewed or relied upon in connection with such report, all communications regarding such report or the analyses therein, and all documents provided to WJE in connection with such report.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number WJE_00000001- WJE_00152711. Furthermore, discovery is ongoing, and investigation continues.

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37. All documents relating to the decision to reroute traffic onto the Eastbound Washington Bridge after the closure of the Washington Bridge in December 2023, as alleged in paragraph 101 of the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

38. All documents relating to or supporting the allegation in paragraph 102 of the Amended Complaint that "increased traffic volume has resulted in physical wear and tear damage" to the Eastbound Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

39. All documents relating to or supporting the allegation in paragraph 103 of the Amended Complaint that "[d]ue to the increased traffic volume on the Eastbound Washington Bridge since the emergency closure of the Washington Bridge, there has been wear and tear to the Eastbound Washington Bridge that would not have otherwise occurred."

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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

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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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

40. All documents relating to the allegation in paragraph 105 of the Amended Complaint that "physical maintenance is required on a more frequent basis to keep the Eastbound Washington Bridge in safe operating condition."

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

41. All documents relating to the allegation in paragraph 106 of the Amended Complaint that "the State has had to install advanced monitoring systems, including real-time sensors and structural health monitoring equipment, to track the structural health and integrity of the Eastbound Washington Bridge in order to ensure ongoing public safety."

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

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42. All documents relating to the condition of the Eastbound Washington Bridge, including but not limited to, whether it is safe for travel and if there are any public safety concerns related to the Eastbound Washington Bridge.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

43. All documents relating to or supporting the State's determination that the Washington Bridge was beyond repair and needed to be demolished.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

44. All documents relating to or supporting the allegation in paragraph 171 of the Amended Complaint that Jacobs "breached its inspection contract."

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they

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exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000064830-RIDOT_000064869; RIDOT_000064871; RIDOT_000064870; RIDOT_000064872; RIDOT_000064873; RIDOT_000064874; RIDOT_000064875; RIDOT_000064876 - RIDOT_000064876; RIDOT_000064877 - RIDOT_000064877; RIDOT_000064879-RIDOT_000064883; RIDOT_000064884 - RIDOT_000064907; RIDOT_000064908 - RIDOT_000064908; RIDOT_000064909 - RIDOT_000064909; RIDOT_000064910 - RIDOT_000064911; RIDOT_000064912- RIDOT_000064916; RIDOT_000064917-RIDOT_000064940; RIDOT_000065253 - RIDOT_000065256; RIDOT_000064941-RIDOT_000064942; RIDOT_000064943- RIDOT_000064949; RIDOT_000064950-RIDOT_000064956; RIDOT_000064957-RIDOT_000065252. Furthermore, discovery is ongoing, and investigation continues.

45. All documents relating to or establishing the duties alleged in paragraphs 174 and 175 of the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000064830-RIDOT_000064869; RIDOT_000064871; RIDOT_000064870; RIDOT_000064872; RIDOT_000064873; RIDOT_000064874; RIDOT_000064875; RIDOT_000064876 - RIDOT_000064876; RIDOT_000064877 - RIDOT_000064877; RIDOT_000064879-RIDOT_000064883; RIDOT_000064884 - RIDOT_000064907; RIDOT_000064908 - RIDOT_000064908; RIDOT_000064909 - RIDOT_000064909; RIDOT_000064910 - RIDOT_000064911; RIDOT_000064912- RIDOT_000064916; RIDOT_000064917-RIDOT_000064940; RIDOT_000065253 - RIDOT_000065256; RIDOT_000064941-RIDOT_000064942; RIDOT_000064943- RIDOT_000064949; RIDOT_000064950-RIDOT_000064956; RIDOT_000064957-RIDOT_000065252. Furthermore, discovery is ongoing, and investigation continues.

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46. All documents relating to or supporting the allegation in paragraph 176 of the Amended Complaint that Jacobs "breached its duty of care."

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000064830-RIDOT_000064869; RIDOT_000064871; RIDOT_000064870; RIDOT_000064872; RIDOT_000064873; RIDOT_000064874; RIDOT_000064875; RIDOT_000064876 - RIDOT_000064876; RIDOT_000064877 - RIDOT_000064877; RIDOT_000064879-RIDOT_000064883; RIDOT_000064884 - RIDOT_000064907; RIDOT_000064908 - RIDOT_000064908; RIDOT_000064909 - RIDOT_000064909; RIDOT_000064910 - RIDOT_000064911; RIDOT_000064912- RIDOT_000064916; RIDOT_000064917-RIDOT_000064940; RIDOT_000065253 - RIDOT_000065256; RIDOT_000064941-RIDOT_000064942; RIDOT_000064943- RIDOT_000064949; RIDOT_000064950-RIDOT_000064956; RIDOT_000064957-RIDOT_000065252. Furthermore, discovery is ongoing, and investigation continues.

47. All documents supporting the allegations in the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001- RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

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48. All documents referenced in the Amended Complaint.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

49. All documents supporting or relating to the State's claims for damages, including but not limited to, the State's allegation in the Amended Complaint that it has suffered "millions of dollars in damages."

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

50. All documents referenced in any of the State's discovery responses or answers in the Action.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are

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identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

51. All documents the State intends to introduce, use, or rely upon in the Action, including but not limited to, all documents that the State intends to introduce, use, or rely upon at any hearing or at trial.

RESPONSE: Plaintiff objects to this request for production to the extent that it seeks information that is protected by the attorney-client privilege, 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 and without waiving the foregoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number RIDOT_000000001– RIDOT_000065256. Furthermore, discovery is ongoing, and investigation continues.

52. All documents related to, used, or considered by each expert the State intends, expects, or may call as a witness, including any opinions rendered, any documents upon which each opinion is based, any document considered by each expert in formulating each opinion, any documents authored or contributed to and all presentations given or participated in by such expert, all documents that the State has provided to or made available to each expert, and all documents that each expert has shown to the State.

RESPONSE: Plaintiff objects to this request for production because it exceeds the scope of discovery permitted under Rule 26(b)(4) of the Superior Court Rules of Civil Procedure, which, in relevant part, limits a request for production of this nature to "documents and materials relied upon by a person whom the other party expects to call as an expert witness at trial in formulating that expert's opinion(s)." Plaintiff further objects to this request on the grounds that it is premature. Subject to and without waiving said objections, Plaintiff will produce responsive documents within the scope of Rule 26(b)(4) consistent with the Court's Scheduling Order.

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Plaintiff,
State of Rhode Island,
By its Attorneys,

/s/ Stephen N. Provazza

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of December, 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*

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