

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.,

TRANSYSSTMS CORPORATION, and

VANASSE HANGEN BRUSTLION, INC.

*Defendants.*

### **JOINT STATUS REPORT**

Now come the Plaintiff and the Defendants (together, the “Parties”), by and through their respective counsel, and pursuant to Section XVIII of the Scheduling Order entered on July 30, 2025 (the “Scheduling Order”), hereby submit this Joint Status Report in advance of the monthly conference scheduled for January 6, 2026:

1. Plaintiff contends the Parties remain actively engaged in the exchange of written discovery, including interrogatories, requests for admission, and document production.
2. Defendants contend the discovery process is being impeded by Plaintiff’s improper objections which have delayed the exchange of needed information.

3. Some, but not all, of the Defendants have filed motions to compel, which generally involve, but are not limited to, the Plaintiff's assertion of the deliberative process privilege and the number of interrogatories that some of the Defendants are entitled to propound.

4. To that end, now pending before the Court are the following motions: (a) Defendant/Counterclaimant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV's (the "JV") Motion to Compel, which was filed on December 12, 2025; (b) Defendant AECOM Technical Services, Inc.'s ("AECOM") Motion to Compel Plaintiff's Responses to Document Requests and Privilege Log, which was filed on December 15, 2025; (c) AECOM's Motion to Compel Answers to Interrogatories and Request to Remove the Interrogatory Cap Under Rule 33(b); (d) Defendant Vanasse Hangen Brustlin, Inc.'s Joinder to Motions to Compel Filed by AECOM and the JV; and (e) the JV's Second Motion to Compel (together, the "Motions to Compel").

5. In light of the holidays, and to provide the Plaintiff with adequate time to respond to the issues raised in the Motions to Compel, on December 23, 2025, the Plaintiff, through counsel, requested a continuance of the hearing date.

6. In response, the Court indicated that the Motions to Compel will be heard on a date to be determined at the Court's January 6, 2026 conference.

7. To the extent that the issues raised in the Motions to Compel cannot be resolved prior to or shortly following the Court's January 6, 2026 conference, the Plaintiff anticipates requesting a streamlined briefing schedule to respond to each of the Motions to Compel and a hearing date, at the Court's convenience, in mid-to-late January.

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of January, 2026, 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/ Edward D. Pare III