

STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT
PC-2024-04526

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.)

**STEERE ENGINEERING, INC.’S
FIRST SET OF REQUESTS TO PLAINTIFF, STATE OF RHODE ISLAND,
FOR PRODUCTION OF DOCUMENTS AND PHYSICAL THINGS**

Pursuant to Rule 34 of the Rhode Island Superior Court Rules of Civil Procedure, Defendant, Steere Engineering, Inc. (“Steere” or “Defendant”), requests that the Plaintiff, State of Rhode Island (the “State” or “Plaintiff”), produce and permit Defendant to inspect or copy the documents and/or other tangible things as hereinafter described, which are in the actual or constructive possession, custody and/or control of the Plaintiff, at the offices of Freeman Mathis & Gary, LLP at 10 Dorrance Street, Providence, RI 02903 within forty (40) days after receipt of this request.

INSTRUCTIONS

1. These Document Requests shall be deemed to be continuing up to the time of trial so as to require supplementation if additional responsive documents become available or known to you. Failure to seasonably supplement your responses to these Document Requests at any time prior to the conclusion of this case shall be deemed “knowing concealment” of such information.

2. If any document or other tangible thing exists that has been identified in a Document Request, but which has been withheld for any reason, including privilege, work product doctrine, or other reason, please identify each such document by listing for each its date; the author (if known); each addressee; other recipients of the document; the general subject matter of the document (in a way that will not disclose information sought to be protected); the grounds on which you are withholding it, including an explanation, if applicable, of why a privilege or other legal basis for withholding the document exists.

DEFINITIONS

1. Communication. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

2. Document. The term “document” is defined to be synonymous in meaning and equal in scope to the usage of this term in Rule of Civil Procedure 34(a) and includes electronically stored information (including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations) stored in any medium from which information can be obtained either directly or, if necessary, after translation, by the responding party into a reasonably usable form or format. A draft or non-identical copy is a separate document within the meaning of this term.

3. The use in any Document Request of a specific term or item by way of example or illustration is not intended to limit the generality of the Document Request or any applicable definition.

4. Parties. The terms “Plaintiff” and “Defendant(s)” as well as a party's full or abbreviated name or a pronoun referring to a party mean the party and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries, or affiliates. This definition is not intended to impose a discovery obligation on any person who is not a party to the litigation.

5. Person. The term “person” is defined as any natural person or any business, legal, or governmental entity or association.

6. Concerning. The term “concerning” means referring to, relating to, describing, evidencing, supporting, suggesting, demonstrating, reflecting, and/or constituting.

7. Plaintiff. The term “Plaintiff” refers to the plaintiff in the above-captioned action, the State of Rhode Island, and all of its representatives and agents.

8. You. The terms “You”, “Your”, and/or the “State” refer to the plaintiff in the above-captioned action, the State of Rhode Island, and all of its representatives and agents.

9. Steere. The term “Steere” refers to the defendant in the above-captioned action, Steere Engineering, Inc., and all of its representatives and agents.

10. Defendants. The term “Defendants” refers collectively to the parties who You named as Defendants in the Amended Complaint, and all of their respective representatives and agents.

11. Amended Complaint. The term “Amended Complaint” as used herein shall refer to the Amended Complaint dated April 14, 2025, filed in the Providence Superior Court, Civil Action number PC-2024-04526.

12. Westbound Washington Bridge. The term the “Westbound Washington Bridge” refers to the bridge formally known as Rhode Island Bridge No. 700 referenced and defined as the “Washington Bridge” in the introductory paragraph of the Amended Complaint.

13. Eastbound Washington Bridge. The term the “Eastbound Washington Bridge” refers to the bridge formally known as Rhode Island Bridge No. 200 referenced and defined as the “Eastbound Washington Bridge” at paragraph 96 of the Amended Complaint.

14. The present tense shall include past and future tenses as well. The singular includes the plural, and the plural includes the singular.

15. “All” shall mean “any and all,” just as “any” shall mean “any and all.”

16. “Including” shall mean “including, but not limited to.”

17. “And” and “or” encompasses both and/or.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

All documents concerning the facts, events, and/or circumstances alleged in the Amended Complaint, and/or that you contend are relevant to any issue in this civil action.

REQUEST NO. 2:

All documents concerning Your allegation that Steere was negligent in connection with any work and/or services that Steere provided concerning the Westbound Washington Bridge.

REQUEST NO. 3:

All communications between You and any of the Defendants concerning any facts, events, and/or circumstances alleged in the Amended Complaint, and/or that you contend are relevant to any issue in this civil action.

REQUEST NO. 4:

All communications between You and any persons and/or entities who are not parties to this lawsuit concerning any facts, events, and/or circumstances alleged in the Amended Complaint, and/or that you contend are relevant to any issue in this civil action.

REQUEST NO. 5:

All internal communications between and/or among any employees, agents, representatives, and/or personnel of the State concerning any facts, events, and/or circumstances alleged in the Amended Complaint.

REQUEST NO. 6:

For each person You expect to call as an expert witness at the trial of this civil action, produce: (a) a copy of all documents, data, or other material considered by the witness in forming their opinions concerning this matter, (b) any exhibits that will be used to summarize or support each opinion, (c) the witness's most recent curriculum vitae, (d) a list of all publications authored by the expert in the previous 10 years, (e) a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition, (f) all documents produced to, received from, or otherwise exchanged with the witness, (g) each report (including all drafts) generated by the witness, and (h) all non-privileged communications between the witness and Plaintiff's counsel.

REQUEST NO. 7:

All documents, reports, records, and correspondence given to, generated, prepared, or relied upon by each witness (including but not limited to expert witnesses) whom You intend to call at the trial of this civil action.

REQUEST NO. 8:

All statements or affidavits, written or oral, transcribed, signed, or unsigned, sent to and/or received by You or any person acting on Your behalf, concerning any facts, events, and/or circumstances alleged in the Amended Complaint.

REQUEST NO. 9:

All documents that You intend to introduce as evidence at the trial of this civil action.

REQUEST NO. 10:

All e-mails, in native format, concerning the facts, events, and/or circumstances alleged in the Amended Complaint, and/or that you contend are relevant to any issue in this civil action.

REQUEST NO. 11:

All documents concerning any alleged damages that You contend to have suffered as a result of the conduct of any of the Defendants for which You seek to recover in this civil action.

REQUEST NO. 12:

All photographs, films, diagrams, videotapes, depictions, sketches, communications, reports, notes, summaries, and/or any other documents of any kind or nature concerning the alleged condition of the Westbound Washington Bridge that You allege led to its emergency closure on or about December 11, 2023, and subsequent demolition.

REQUEST NO. 13:

All documents concerning Your allegation that any acts and/or omissions by Steere caused and/or contributed to any damages for which You seek to recover in this civil action.

REQUEST NO. 14:

All documents concerning Your allegation that any acts and/or omissions by any of the Defendants caused and/or contributed to any damages for which You seek to recover in this civil action.

REQUEST NO. 15:

All documents reviewed, relied upon, and/or consulted by You in connection with answering any Interrogatories served upon You by any of the Defendants in this civil action.

REQUEST NO. 16:

Any and all reports and/or other documents prepared by any Rhode Island State governmental agency and/or personnel concerning the facts, events, and/or circumstances alleged in the Amended Complaint, and/or that you contend are relevant to any issue in this civil action.

REQUEST NO. 17:

All records, bills, invoices, statements, and documents concerning payment of any expenses and/or costs of any kind for which You seek to recover in this civil action.

REQUEST NO. 18:

All documents concerning any work and/or services You allege Steere was contracted to perform, and any other involvement You allege Steere had concerning the Westbound Washington Bridge.

REQUEST NO. 19:

All documents concerning the State's involvement, role(s), and/or responsibilities in connection with any work and/or services that You allege Steere was obligated to perform concerning the Westbound Washington Bridge.

REQUEST NO. 20:

All documents concerning Your decision to issue an emergency declaration of closure of the Westbound Washington Bridge on December 11, 2023, as alleged in paragraph 94 of the Amended Complaint.

REQUEST NO. 21:

All documents concerning any maintenance, repair, rehabilitation, and/or replacement of any parts, components, aspects, portions, structures, and/or systems of the Westbound Washington Bridge considered, undertaken, and/or performed at any time between January 1, 2013, and December 11, 2023.

REQUEST NO. 22:

All documents concerning any actions, deliberations, decisions, and/or determinations by You concerning any maintenance, repair, rehabilitation, and/or replacement of any parts, components, aspects, portions, structures, and/or systems of the Westbound Washington Bridge that You made as a result of receiving the "Final Technical Evaluation" and/or the "Final Inspection Report" referenced at paragraph 61 of the Amended Complaint.

REQUEST NO. 23:

All documents concerning Your allegation at paragraph 112 of the Amended Complaint that Steere owed You a duty to conform to the standard of skill, care, and diligence exercised by the average professional engineering, consulting, construction, inspection, and design firm.

REQUEST NO. 24:

All documents concerning any instructions, direction, guidance, recommendations, requests, and/or oversight that You provided to Steere and/or to any of the other Defendants in connection with any work, services, and/or any other involvement that You allege Steere was obligated to perform concerning the Washington Bridge.

REQUEST NO. 25:

All documents concerning Your allegation at paragraph 114 of the Amended Complaint that Steere allegedly breached a duty of care owed to You by failing to: “conduct a reasonable adequate detailed research and review of previous inspection reports, drawings, and plans – including but not limited to, the Original Design Plans, and the plans for the 1996-1998 rehabilitation project....”

REQUEST NO. 26:

All previous inspection reports, drawings, and plans that You allege at paragraph 114 of the Amended Complaint Steere should have researched and/or reviewed.

REQUEST NO. 27:

All documents concerning any action You took to provide Steere with copies or and/or access to the previous inspection reports, drawings, and plans that You allege at paragraph 114 of the Amended Complaint Steere should have researched and/or reviewed.

REQUEST NO. 28:

All documents concerning Your allegation at paragraph 114 of the Amended Complaint that Steere allegedly breached a duty of care owed to You by failing to: “recognize the importance and significance of the tie-down rods as critical to the stability of the Washington Bridge....”

REQUEST NO. 29:

All documents concerning Your allegation at paragraph 114 of the Amended Complaint that Steere allegedly breached a duty of care owed to You by allegedly failing to: “perform an investigation into or evaluation of the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams....”

REQUEST NO. 30:

All documents concerning Your allegation at paragraph 114 of the Amended Complaint that Steere allegedly breached a duty of care owed to You by allegedly failing to: “recommend repairs to address the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams....”

REQUEST NO. 31:

All documents concerning Your allegation at paragraph 114 of the Amended Complaint that Steere allegedly breached a duty of care owed to You by allegedly failing to: “ensure [Steere] possessed adequate technical competence, experience, and skill to perform the work”

REQUEST NO. 32:

All documents concerning Your allegation at paragraph 114 of the Amended Complaint that Steere allegedly breached a duty of care owed to You by allegedly failing to: “honestly convey [its] past experience and competence when soliciting to be chosen by the State to perform the work....”

REQUEST NO. 33:

All documents concerning any action(s) You took upon receiving the information referenced in paragraph 86 of the Amended Complaint, to ensure that “fracture criticality of the tie-downs” at Piers 6 and 7 was addressed as referenced in paragraph 87 of the Amended Complaint.

REQUEST NO. 34:

All documents concerning the existence of the “(1) Tie-down rod failures at Pier 7; ... (2) Tie-down rods compromised at Pier 6 [and, (3)] evidence of a possible failure of other tie-down rods” as referenced in paragraphs 92 and 93 of the Amended Complaint.

REQUEST NO. 35:

All documents concerning that the “(1) Tie-down rod failures at Pier 7; ... (2) Tie-down rods compromised at Pier 6 [and, (3)] evidence of a possible failure of other tie-down rods” as referenced in paragraphs 92 and 93 of the Amended Complaint existed at any time during which Steere performed any work and/or services on the Westbound Washington Bridge

REQUEST NO. 36:

All documents concerning that the “unaddressed voids, poor grout, moisture, and corrosion, resulting in widespread deterioration of the post-tensioning system” referenced in paragraph 95 of the Amended Complaint existed at any time during which Steere performed any work and/or services on the Westbound Washington Bridge

REQUEST NO. 37:

All documents concerning any “physical damages” to property and/or any “economic damages” referenced in Paragraph 117 of the Amended Complaint.

REQUEST NO. 38:

All documents concerning any claims, demands, threats, notices, assertions, allegations, and/or contentions made or brought against You by any third parties as referenced in Paragraph 201 of the Amended Complaint.

REQUEST NO. 39:

All documents concerning any claims, demands, threats, notices, assertions, allegations, and/or contentions made or brought against You by any third parties as referenced in Paragraph 205 of the Amended Complaint.

REQUEST NO. 40:

All documents concerning any alleged increased wear and tear damage that the Eastbound Washington Bridge allegedly has suffered due to the emergency closure on December 11, 2023, and/or subsequent demolition of the Westbound Washington Bridge.

REQUEST NO. 41:

All documents concerning any alleged increased maintenance and/or repair work to the Eastbound Washington Bridge that allegedly has been necessary due to the emergency closure on December 11, 2023, and/or subsequent demolition of the Westbound Washington Bridge.

REQUEST NO. 42:

All documents concerning any actions, deliberations, decisions, and/or determinations by You regarding any maintenance, repair, rehabilitation, and/or replacement of any parts, components, aspects, portions, structures, and/or systems of the Westbound Washington Bridge that You made as a result of receiving the information transmitted by AECOM to Anthony M. Pompei on or about January 18, 2019, contained in and/or attached to AECOM's January 18, 2019, memo concerning "Reuse of Existing Substructure."

REQUEST NO. 43:

Any and all items, components, pieces, remnants, constituent parts, and/or any other materials that previously formed part of the Westbound Washington Bridge, which have been preserved by You and/or Your agents following the emergency closure and subsequent demolition of the Westbound Washington Bridge referenced at paragraphs 94 and in the introduction of the Amended Complaint.

Defendant,
Steering Engineering, Inc.
By its Attorneys,

/s/ Warren D. Hutchison

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Dated: January 21, 2026

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this day, January 21, 2026, a true copy of the foregoing has been filed and served on all parties of record through the Rhode Island electronic filing system.

/s/Warren D. Hutchison

Warren D. Hutchison