

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.)
STEEER ENGINEERING, INC.,)
TRANSYSTEMS CORPORATION, and)
VANASSE HANGEN BRUSTLIN, INC.,)
)
Defendants.)

**STEEER ENGINEERING, INC.’S FIRST SET OF INTERROGATORIES
TO PLAINTIFF, STATE OF RHODE ISLAND**

Defendant, Steere Engineering, Inc. (“Steere” or “Defendant”), pursuant to Rules 26 and 33 of the Rhode Island Superior Court Rules of Civil Procedure, propounds the following First Set of Interrogatories (“Interrogatories”) to the Plaintiff, State of Rhode Island’s (the “State” or “Plaintiff”), to be answered under oath within forty (40) days after service.

INSTRUCTIONS

1. These Interrogatories shall be deemed to be continuing up to the time of trial so as to require supplemental answers if additional information or additional facts become available or known to you.
2. Where knowledge and/or information in possession of a party is requested, such

request includes knowledge of the party's agents, representatives, and, unless privileged, its attorney(s).

3. Should you decline to answer any Interrogatory set forth herein, or any portion of an Interrogatory, whether based on a claim of privilege or any other claim/objection, please specify the subject matter of the information being withheld, the specific objection relied upon, and describe in detail the nature and basis of your claim of privilege.

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). A draft or non-identical copy is a separate document within the meaning of this term.

3. **Identify (With Respect to Persons).** When referring to a person, "to identify" means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

4. **Identify (With Respect to Documents).** When referring to documents, "to identify" means to give, to the extent known, the:

- (A) type of document;
- (B) general subject matter;
- (C) date of the document; and
- (D) author(s), addressee(s), and recipient(s).

5. **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.

6. **Person.** The term "person" is defined as any natural person or any business, legal, or governmental entity or association.

7. **Concerning.** The term "concerning" means referring to, relating to, describing, evidencing, supporting, suggesting, demonstrating, reflecting, and/or constituting.

8. When an Interrogatory calls upon a party to "state the basis" of or for a particular objection, claim, assertion, allegation, or contention, the party shall:

- (A) identify each and every document (and where pertinent, the section, article, or subparagraph thereof), which forms any part of the source of the party's information regarding the alleged facts or legal conclusions referred to by the interrogatory or request;
- (B) identify each and every communication which forms any part of the source of the party's information regarding the alleged facts or legal conclusions referred to by the interrogatory or request;
- (C) state separately the acts or omissions to act on the part of any person (identifying the acts or omissions to act by stating their nature, time, and place and identifying the persons involved) which form any part of the party's information regarding the alleged facts or legal conclusions referred to in the interrogatory or request; and
- (D) state separately any other fact which forms the basis of the party's information regarding the alleged facts or conclusions referred to in the interrogatory or request.

9. 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.

10. 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.

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

12. 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.

13. 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.

14. 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.

15. 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.

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

17. "All" shall mean "any and all," just as "any" shall mean "any and all."

18. "Including" shall mean "including, but not limited to."

19. "And" and "or" encompasses both and/or.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each person who prepared or assisted in the preparation of Your answers to these Interrogatories, including in Your answer identification of any person(s) who contributed or provided any information or subject matter knowledge, and as to each such person, identify by number the specific Interrogatories and/or sub-parts of Interrogatories that such person prepared or assisted in the preparation of.

INTERROGATORY NO. 2:

Identify and describe in detail all work and/or services You allege Steere was contracted to perform, and any other involvement You allege Steere had concerning the Westbound Washington Bridge.

INTERROGATORY NO. 3:

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

INTERROGATORY NO. 4:

State the basis for the allegation that Steere was negligent, and how Steere's alleged negligence caused and/or contributed to any damages that You seek to recover in this lawsuit.

INTERROGATORY NO. 5:

If You contend that at some point prior to the emergency closure of the Westbound Washington Bridge on December 11, 2023, Steere allegedly should have identified 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" referenced in paragraphs 92 and 93 of

the Amended Complaint, state the basis for that contention, including in your answer, but not limiting it to: (i) each contract, including section, paragraph, and/or page number, which You allege obligated Steere to perform investigations and/or inspections that would have identified the existence of those conditions; (ii) the timeframe during which You allege Steere allegedly should have identified the existence of those conditions; (iii) the basis for Your contention that those conditions existed during the timeframe referenced in Your answer to subpart ii of this Interrogatory; (iv) the extent to which those conditions changed, progressed, and/or worsened between the timeframe during which You allege Steere allegedly should have identified the existence of those conditions and December 11, 2023; and (v) the basis for Your answer to subpart iv of this Interrogatory.

INTERROGATORY NO. 6:

If You contend that at some point prior to the emergency closure of the Westbound Washington Bridge on December 11, 2023, Steere allegedly should have identified the existence of 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, state the basis for that contention, including in your answer, but not limiting it to: (i) the contract, including section, paragraph, and/or page number, which You allege obligated Steere to perform investigations and/or inspections that would have identified the existence of those conditions; (ii) the timeframe during which Steere allegedly should have identified the existence of those conditions; and (iii) the basis for Your contention that those conditions existed during the timeframe referenced in Your answer to subpart ii of this Interrogatory; (iv) the extent to which those conditions changed, progressed, and/or worsened between the timeframe during which You allege Steere allegedly should have identified the existence of those conditions and December 11, 2023; and (v) the basis for Your answer to sub-part iv of this Interrogatory.

INTERROGATORY NO. 7:

Identify, itemize, and describe in detail all “physical damages” to property and all “economic damages” referenced in Paragraph 117 of the Amended Complaint, including in Your answer to this Interrogatory, a description of the manner by which each component of such damages was calculated, identification of all persons with knowledge of the State’s alleged damages, and identification of all documents supporting or otherwise concerning the State’s alleged damages.

INTERROGATORY NO. 8:

Identify and describe in detail any and all claims, demands, threats, notices, assertions, allegations, and/or contentions made or brought against You by any third parties as referenced in Paragraphs 201 and/or 205 of the Amended Complaint.

INTERROGATORY NO. 9:

Identify, itemize, and describe in detail any alleged increased wear and tear damage that the Eastbound Washington Bridge has suffered due to the closure on December 11, 2023, and/or

subsequent demolition of the Westbound Washington Bridge, including in Your answer, but not limiting it to: (i) the means by which You calculate the amount of alleged increased wear and tear damage; (ii) all facts supporting such calculation; (iii) the identity of all persons with knowledge of the alleged increased wear and tear damage; and (iv) the identity of all documents concerning the alleged increased wear and tear damage.

INTERROGATORY NO. 10:

Identify, itemize, and describe in detail any alleged increased maintenance and/or repair work to the Eastbound Washington Bridge that has been necessary due to the closure on December 11, 2023, and/or subsequent demolition of the Westbound Washington Bridge.

INTERROGATORY NO. 11:

If You contend that Steere was required to perform: (i) a load rating analysis, (ii) fracture critical analysis, (iii) non-redundant steel tension member analysis, (iv) agency defined elements material testing analysis, and/or (v) any other analysis, assessment, or inspection concerning any aspects, components, and/or systems of the Westbound Washington Bridge, specify which, if any such specific analyses You contend Steere was required to perform, and state the basis for Your contention, including in Your answer, but not limiting it to, all facts supporting Your contention, the identification of each contract, including section, paragraph, and/or page number, which obligated Steere to perform such analyses, and the identification of all persons with knowledge of facts supporting Your contention.

INTERROGATORY NO. 12:

Identify and describe in detail what You did with 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," including in Your answer, but not limiting it to, all facts concerning how and why the State made the determination not to pursue replacement of the superstructure of the Westbound Washington Bridge after receiving that information.

INTERROGATORY NO. 13:

Identify by full name and residential address each person whom You intend to call as a witness at the trial of this matter.

INTERROGATORY NO. 14:

Identify by full name, residential address, name of employer, business address and relationship to You (if any) each person whom You expect to call as an expert witness at the trial of this matter, and as to each such expert, please state:

- a. the subject matter on which the expert is expected to testify;

- b. the substance to the facts to which the expert is expected to testify;
- c. the substance of the opinions to which the expert is expected to testify; and
- d. a summary of the grounds for each opinion to which the expert is expected to testify.

INTERROGATORY NO. 15:

Identify, itemize, and describe in detail all items, components, pieces, remnants, constituent parts, and/or any other materials that formed part of the Westbound Washington Bridge, that 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 section of the Amended Complaint, including in Your answer, but not limiting it to, a description of where and in whose possession all such items, components, pieces, remnants, constituent parts, and/or materials are now located.

INTERROGATORY NO. 16:

Identify and describe in detail all work and/or services You allege Steere performed, or was obligated to but did not perform, concerning the Westbound Washington Bridge that You allege resulted in and/or contributed in any way to the need to close and demolish the Westbound Washington Bridge.

INTERROGATORY NO. 17:

For each category of work and/or services identified in Your answer to Interrogatory Number 17 above, state the basis for Your allegation that Steere's conduct and/or action caused and/or contributed to the need to close and demolish the Westbound Washington Bridge.

INTERROGATORY NO. 18:

Identify and describe in detail all work and/or services You allege Steere performed that You allege resulted in and/or contributed in any way to the "2016 Construction Plans" referenced at paragraphs 63 and 64 of the Amended Complaint.

INTERROGATORY NO. 19:

Identify and describe in detail all instructions, direction, guidance, recommendations, requests, and/or oversight You provided to Steere and/or to any of the other Defendants in connection with any work and/or services performed by Steere concerning the Washington Bridge.

INTERROGATORY NO. 20:

Identify and describe in detail the specific location and/or locations of the “unaddressed voids, poor grout, moisture, ... corrosion ... [and] deterioration of the post-tensioning system...” referenced at paragraph 95 of the Amended Complaint.

INTERROGATORY NO. 21:

If You allege that in connection with the work and/or services that Steere provided concerning the Westbound Washington Bridge, Steere failed to conform to the standard of skill, care, and diligence exercised by the average professional engineering, consulting, construction, inspection, and design firm, state the basis for that allegation, including in Your answer, but not limiting it to, each contract, including section, paragraph, and/or page number, on which You rely.

INTERROGATORY NO. 22:

State the basis for 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...” Include in Your answer, but do not limit Your answer to: (i) each contract, including section, paragraph, and/or page number, that You allege obligated Steere to conduct such research and/or review; (ii) the date or dates by which You allege Steere should have conducted such research and/or review; (iii) all previous inspection reports, drawings, and plans that You allege Steere should have researched and/or reviewed; and (iv) what, if any, action You took to provide Steere with copies and/or access to the previous inspection reports, drawings, and plans that You allege Steere should have researched and/or reviewed.

INTERROGATORY NO. 23:

State the basis for Your allegation at paragraph 114 of the Amended Complaint that Steere 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...”, including in Your answer, but not limiting it to: (i) the specific location, pier and/or span number of the particular tie-down rods that You allege Steere was obligated to inspect, consider, and/or evaluate; (ii) each contract, including section, paragraph, and/or page number, pursuant to which You allege Steere was obligated to inspect, consider, and/or evaluate those tie-down rods; (iii) the specific timeframe during which You allege Steere should have inspected, considered, and/or evaluated those tie-down rods; (iv) the condition of those tie-down rods at the time that Steere allegedly should have inspected, considered, and/or evaluated them; and (v) the basis for Your contention concerning the condition of the tie-down rods at the time referenced in sub-part iv of this Interrogatory.

INTERROGATORY NO. 24:

State the basis for Your allegation at paragraph 114 of the Amended Complaint that Steere 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...”, including in Your answer, but not limiting it to: (i) the specific location, pier and/or span number of the post-tensioned cables that You allege Steere was obligated to inspect, consider, and/or evaluate; (ii) each contract, including section, paragraph, and/or page number, which You allege obligated Steere to inspect, consider, and/or evaluate those post-tensioned cables; (iii) the specific timeframe during which You allege Steere should have inspected, considered, and/or evaluated those post-tensioned cables; (iv) the condition of the post-tensioned cables at the time that Steere allegedly should have inspected, considered, and/or evaluated them; and (v) the basis for Your contention concerning the condition of the post-tensioned cables at the time referenced in sub-part iv of this Interrogatory.

INTERROGATORY NO. 25:

State the basis for Your allegation at paragraph 114 of the Amended Complaint that Steere breached a duty of care owed to You by failing to: “recommend repairs to address the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams...”, including in Your answer, but not limiting it to: (i) the specific location, pier and/or span number of the post-tensioned cables for which You allege Steere failed to recommend repairs to address cracking; (ii) each contract, including section, paragraph, and/or page number, which You allege obligated Steere to recommend such repairs; (iii) the specific timeframe during which You allege Steere should have recommended such repairs; (iv) the nature, type, and specific description of the repairs that You allege Steere should have recommended; (v) the basis for Your contention that such repairs, if recommended by Steere during the timeframe referenced in Your answer to sub-part iii of this Interrogatory, would have been promptly implemented by the State; (vi) the specific period of time by which You contend such repairs, if recommended by Steere during the timeframe referenced in Your answer to sub-part iii of this Interrogatory and promptly implemented by the State, would have extended the service life of the Westbound Washinton Bridge; and (vii) the basis for Your answer to sub-part vi of this Interrogatory.

INTERROGATORY NO. 26:

State the basis for Your allegation at paragraph 114 of the Amended Complaint that Steere breached a duty of care owed to You by failing to: “ensure [Steere] possessed adequate technical competence, experience, and skill to perform the work ...”, including in Your answer, but not limiting it to: (i) identification of the specific areas of technical competence, experience, skill and/or other qualifications that You allege Steere failed to possess; (ii) identification by name and role on the project, of the specific individual(s) whom You allege worked for Steere and had involvement with the Westbound Washington Bridge while failing to possess adequate technical competence, experience, skill and/or other qualifications to perform the work; and (iii) description of the specific level of technical competence, experience, skill and/or other qualifications that You contend would have been “adequate” but that Steere allegedly failed to ensure that it possessed.

INTERROGATORY NO. 27:

State the basis for Your allegation at paragraph 114 of the Amended Complaint that Steere breached a duty of care owed to You by failing to: “honestly convey [its] past experience and competence when soliciting to be chosen by the State to perform the work...”, including in Your answer, but not limiting it to: (i) identification of any and all instances in which Steere was not honest with either the State or any of the Defendants concerning Steere’s past experience and/or competence; (ii) each particular document and/or individual whom You allege conveyed Steere’s past experience and/or competence that You allege was not honest; (iii) identification of when and how the State first became aware of any statements and/or representations concerning Steere’s past experience and competence that You contend was not honest; and (iv) identification of any action(s) and/or decision(s) by You in reliance upon any statements and/or representations concerning Steere’s past experience and competence that You contend was not honest.

INTERROGATORY NO. 28:

Identify and describe in detail what, if any, action(s) You took, and when You took it, 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.

INTERROGATORY NO. 29:

Identify and describe in detail what, if any, equipment, devices, tools, apparatus, methods, and/or means of gaining access to relevant areas were used in connection with VHB’s identification on December 8, 2023, of “(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.

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