

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'S SECOND SUPPLEMENTAL RESPONSE TO DEFENDANT
BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV'S THIRD
REQUEST TO PRODUCE DATED OCTOBER 1, 2025**

Pursuant to Rule 34 of the Superior Court Rule of Civil Procedure, now comes the Plaintiff, State of Rhode Island (the "Plaintiff" or "State"), and hereby submits the following Second Supplemental Responses to Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV's Third Request to Produce dated October 1, 2025:

54. All text messages and emails between or among Peter Alviti, Jr., P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

55. All text messages and emails between or among Robert Rocchio, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING THE WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

56. All text messages and emails between or among Lori Fisette and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

57. All text messages and emails between or among Loren Doyle and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

58. All text messages and emails between or among John Preiss, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

61. All text messages and emails between or among Anthony Pompei, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

62. All text messages and emails between or among Keith Gaulin, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

63. All text messages and emails between or among Ryan Salvias and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

64. All text messages and emails between or among Chris Hart P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

65. All text messages and emails between or among David Fish and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

Respectfully Submitted,
Plaintiff,
State of Rhode Island,
By its Attorneys,

/s/ Sarah W. Rice
Sarah W. Rice, Esq. (#10588)
Assistant Attorneys General
Rhode Island Office of the Attorney General
150 S. Main Street
Providence, RI 02903
Tel: (401) 274-4400
srice@riag.ri.gov
sprovazza@riag.ri.gov

/s/ Theodore J. Leopold
Theodore J. Leopold (admitted *pro hac vice*)
Leslie M. Kroeger (admitted *pro hac vice*)
Diana L. Martin (admitted *pro hac vice*)
Poorad Razavi (admitted *pro hac vice*)
Takisha Richardson (admitted *pro hac vice*)
Adnan Toric (admitted *pro hac vice*)
Cohen Milstein
11780 U.S. Highway One, Suite N500
Palm Beach Gardens, FL 33408
[tleopold@cohenmilstein.com](mailto:t Leopold@cohenmilstein.com)
lkroeger@cohenmilstein.com
dmartin@cohenmilstein.com
prazavi@cohenmilstein.com
trichardson@cohenmilstein.com

atoric@cohenmilstein.com

/s/ Jonathan N. Savage
Jonathan N. Savage, Esq. (#3081)
Michael P. Robinson, Esq. (#6306)
Edward D. Pare III, Esq. (#9698)
Savage Law Partners, LLP
564 South Water Street
Providence, RI 02903
Tel: (401) 238-8500
Fax: (401) 648-6748
js@savagelawpartners.com
mrobinson@savagelawpartners.com
epare@savagelawpartners.com

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January 2026, 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

Folder	Zip Password	Link
FTP Password	CONaHj0P1nLg=S	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
AECOM Tech	.jMcQg*8jV?}FI1	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
AETNA Bridge	Jj_fxN9Xm~@4+4p	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
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Barletta Heavy	paLMHK3BkzP>uft	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
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Cardi Corp	JrwU=zeUgKB,fp7	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Collins Engineers	xp7@3clz1xRFP:@	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Commonwealth	nDFEb)jVCjA4W2y	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
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Michael Baker	JV4Y8ZUYHij*}Jn	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Prime AE]2LH-jo5A7uLWZe	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Steere Eng	~!E@~^G^4Y%Lx?j	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Transystems	>B6g*o2]>@5NfCb	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
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