

STATE OF RHODE ISLAND  
PROVIDENCE, SC

SUPERIOR COURT

STATE OF RHODE ISLAND

*Plaintiff,*

v.

AECOM TECHNICAL SERVICES, INC., *et al.*

*Defendant.*

C.A. No. PC-2024-04526

**DEFENDANT AECOM TECHNICAL SERVICES, INC.'S OBJECTIONS AND  
RESPONSES TO PLAINTIFF, THE STATE OF RHODE ISLAND'S, SECOND SET OF  
DOCUMENT REQUESTS**

Pursuant to Rule 34 of the Rhode Island Superior Court Rules of Civil Procedure, Co-Defendant AECOM Technical Services, Inc. ("AECOM"), through undersigned counsel, hereby objects and responds to Plaintiff, the State of Rhode Island's (the "State"), Second Set of Document Requests, served on AECOM on March 6, 2026, (the "Requests," and each a "Request") as follows:

**GENERAL OBJECTIONS**

The following General Objections apply to and are expressly made part of AECOM's specific response to each Request as set forth below:

1. AECOM objects to the State's Requests and to the instructions and definitions incorporated therein to the extent that they are inconsistent with or purport to impose obligations broader in scope or more burdensome than those imposed by the Rhode Island Rules of Civil Procedure or Superior Court Rules, and AECOM expressly disclaims any obligation to provide any discovery beyond that required by such rules or in a manner not required by such rules.

2. AECOM objects to the State's Requests and to the instructions and definitions incorporated therein to the extent that they seek discovery that is not reasonably relevant to any issue in this litigation and not proportional to the needs of the case.

3. AECOM objects to the State's Requests and to the instructions and definitions incorporated therein to the extent that the burden and/or expense of searching for and producing the requested documents or information outweighs the benefit of the discovery being sought. To the extent that the State's Requests and the instructions and definitions incorporated therein impose such an undue burden and/or expense upon AECOM, they are not proportional to the needs of the case.

4. AECOM objects to the State's Requests and to the instructions and definitions incorporated therein to the extent that they call for the disclosure of information protected by the attorney-client privilege, work-product doctrine, the joint-defense privilege, the common interest doctrine, or any other applicable privilege, protection or immunity from discovery.

5. AECOM objects to the State's Requests and to the instructions and definitions incorporated therein to the extent they seek documents or information not within AECOM's possession, custody, or control.

6. AECOM objects to the State's Requests and to the instructions and definitions incorporated therein to the extent that they require AECOM to search for and produce electronically stored information ("ESI") in a manner or in a format that is inconsistent with the parameters of the agreed ESI Protocol filed on October 24, 2025 (the "ESI Protocol"). AECOM will limit its search for ESI to the search terms, custodians, and other parameters established in accordance with the ESI Protocol and subject to AECOM's general and specific objections, AECOM will produce responsive ESI in a manner and format consistent with the ESI Protocol.

7. AECOM objects to the State's Requests and to the instructions and definitions incorporated therein to the extent that they seek disclosure of expert opinions or documents and other information generated by or at the request of AECOM's testifying experts prior to the exchange of expert reports and prior to the time for expert discovery as set forth in the Court's Scheduling Order dated July 30, 2025.

8. AECOM objects to the State's Requests and to the instructions and definitions incorporated therein to the extent that they seek disclosure of documents and communications that are already in the State and/or the Rhode Island Department of Transportation's ("RIDOT") possession, care, custody and control and/or are more reasonably accessible to the State than to AECOM (*e.g.*, communications and documents already exchanged by the Parties in the ordinary course of business).

9. AECOM objects to the State's Requests to the extent they are duplicative of prior requests or seek documents already produced by AECOM in this litigation. To the extent AECOM has already produced responsive, non-privileged documents, AECOM will not re-produce the same materials absent the agreement of the parties or Court order.

10. AECOM's agreement to produce any document or category of documents in response to any Request shall not be construed as an admission that such documents exist, are relevant, are admissible, or are within the proper scope of discovery.

Subject to and without waiving these general objections, AECOM responds as follows:

## **SPECIFIC OBJECTIONS AND RESPONSES**

### **REQUEST NO. 1:**

All documents relating to the Closure of the Washington Bridge including but not limited to the discovery of failed Tie-Down Rods and the decision to demolish the bridge.

### **RESPONSE NO. 1:**

**Objection.** AECOM objects to this request because it is overly broad and unduly burdensome to the extent it seeks “*all documents relating to the Closure of the Washington Bridge*” without limitation as to time, scope or other terms which adequately define what the State is requesting. AECOM further objects to this request to the extent it seeks documents that are equally available to the State and/or RIDOT, and documents protected by the attorney-client privilege, work-product doctrine, joint-defense privilege, or common-interest doctrine. AECOM further objects to the extent this Request seeks ESI beyond the scope of the parties’ ESI Protocol and beyond the custodians, date ranges, search terms, and other collection parameters that are the subject of the parties’ ongoing meet-and-confer process.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged responsive documents responsive to this request, as well as those identified through its ESI collection and review process. To the extent the parties later resolve the scope of any additional email ESI collection, AECOM will collect, review, and produce any additional non-privileged, non-duplicative responsive documents identified through that process.

### **REQUEST NO. 2:**

All documents or communications You received from or provided to any other party to this Lawsuit since the Closure of the Washington Bridge.

### **RESPONSE NO. 2:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks “*all documents or communications*” with “*any other party*” to this Lawsuit “*since the Closure*” without limitation as to subject matter or issues in dispute. AECOM further objects to this Request to the extent it seeks communications and documents protected by the attorney-client privilege, work-product doctrine, joint-defense privilege, and/or common-interest doctrine. AECOM further objects to this Request to the extent it seeks documents and communications already produced by parties in this litigation, duplicative materials obtained from other parties, or that are equally accessible to the State and/or RIDOT. AECOM further objects to the extent this Request seeks ESI beyond the scope of the parties’ ESI Protocol and beyond the custodians, date ranges, search terms, and other collection parameters that are the subject of the parties’ ongoing meet-and-confer process.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged responsive documents, including those identified through

its ESI collection and review process. To the extent the parties later resolve the scope of any additional email ESI collection, AECOM will collect, review, and produce any additional non-privileged, non-duplicative responsive documents identified through that process.

**REQUEST NO. 3:**

All documents relating to any communications between You and any publication, public medium (including news agencies, wire services, or other media persons), governmental agency, or any representative thereof relating to the Washington Bridge, the Complaint, or the Lawsuit.

**RESPONSE NO. 3:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks “*all documents relating to any communications*” with any publication, public medium, governmental agency, or representative thereof without reasonable limitation as to subject matter or time period. The Request, as drafted, encompasses a broad range of communications unrelated to the claims and defenses in this litigation and seeks materials equally or more readily available to the State. AECOM further objects to the extent this Request seeks documents protected by the attorney-client privilege, work-product doctrine, or the joint-defense and/or common-interest doctrines.

Subject to and without waiving the foregoing objections, to the extent not already produced in AECOM’s prior document productions, AECOM will produce non-privileged documents, if any, relating to external communications by AECOM with governmental agencies or public media relating to the Closure of the Washington Bridge, to the extent that they exist and are in AECOM’s possession, custody, or control.

**REQUEST NO. 4:**

All documents relating to the Washington Bridge that You have responded or provided to any federal or state regulatory, governmental, or investigative agency.

**RESPONSE NO. 4:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks “*all documents relating to the Washington Bridge*” that AECOM has “*responded or provided to any federal or state regulatory, governmental, or investigative agency*” without reasonable limitation as to subject matter, time, or relevance to the claims and defenses at issue in this litigation. AECOM also objects to the term “*investigative agency*” which is undefined and does not have any commonly understood meaning or significance. The Request, as drafted, encompasses a broad range of materials unrelated to the allegations in the State’s Amended Complaint and seeks materials equally or more readily available to the State.

Subject to and without waiving the foregoing objections, to the extent not previously produced, AECOM will produce non-privileged external submissions or communications provided by AECOM to any federal or state regulatory or governmental agencies relating to

the closure of the Washington Bridge, to the extent that they exist and are in AECOM's possession, custody, or control.

**REQUEST NO. 5:**

All working group lists, organization charts, directories, or other documents sufficient to identify individuals and entities with knowledge of the facts which serve as the basis for the Complaint.

**RESPONSE NO. 5:**

**Objection.** AECOM objects to this Request as vague, overly broad, and unduly burdensome. The phrase "*facts which serve as the basis for the Complaint*" is vague and ambiguous and appears to call for AECOM to identify witnesses or synthesize evidence rather than produce specific documents. AECOM further objects to this Request to the extent it seeks information equally or more readily available to the State or information outside AECOM's possession, custody, or control.

Subject to and without waiving the foregoing objections and to the extent not previously produced, AECOM will produce organizational charts showing AECOM personnel who worked on the Washington Bridge for the period from January 1, 2014 to present, to the extent such documents exist and are within AECOM's possession, custody, or control.

**REQUEST NO. 6:**

All documents that reflect, evidence, constitute, or otherwise depict Your organization chart from 2013 through the present.

**RESPONSE NO. 6:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case. The Request seeks AECOM's organization charts "*from 2013 through the present*" without limitation to the business units, personnel, or functions relevant to AECOM's work on the Washington Bridge, and therefore seeks information far beyond the issues in this litigation. AECOM further objects to this Request to the extent it seeks confidential or proprietary business information.

Subject to and without waiving the foregoing objections, AECOM will produce non-privileged documents, if any, sufficient to identify the project-specific reporting structure or organizational framework for AECOM personnel involved in AECOM's Washington Bridge work, to the extent such documents exist and are within AECOM's possession, custody, or control.

**REQUEST NO. 7:**

All insurance policies, including professional liability, errors and omissions, and general liability policies, that may provide coverage for claims arising from Your work on the Washington Bridge.

**RESPONSE NO. 7:**

**Objection.** AECOM objects to this Request only to the extent it seeks insurance information or materials beyond those required to be disclosed under Rule 26(b)(2) of the Rhode Island Superior Court Rules of Civil Procedure, or beyond insurance policies that may provide coverage for the claims asserted in this action. AECOM further objects to this Request to the extent it seeks information regarding policies or coverages that are not potentially applicable, or seeks confidential, proprietary, or commercially sensitive insurance information unrelated to the existence, limits, or terms of coverage.

Subject to and without waiving the foregoing objections, AECOM will produce copies of its professional liability and general liability policies for the period from January 1, 2014 to December 31, 2024, as required by Rule 26(b)(2).

**REQUEST NO. 8:**

All documents and communications relating to any invoices, requests for payments, change orders, or requests for change relating to the Washington Bridge that You (a) prepared and/or (b) submitted to the State.

**RESPONSE NO. 8:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not relevant or proportional to the needs of the case to the extent it seeks “all documents and communications relating to” any invoices, requests for payment, change orders, or requests for change without limitation as to subject matter or any nexus to the claims or defenses asserted in this litigation. The Request improperly seeks documents that have no potential relevance to the issues in dispute and do not bear on liability, causation, or damages alleged in the Amended Complaint. AECOM further objects to this Request to the extent it seeks documents equally available to the State and/or RIDOT, including invoices, payment applications, and change orders submitted directly to or generated by the State and/or RIDOT. AECOM further objects to the extent this Request seeks ESI beyond the scope of the parties’ ESI Protocol and beyond the custodians, date ranges, search terms, and other collection parameters that are the subject of the parties’ ongoing meet-and-confer process. AECOM further objects to the extent the Request seeks documents protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged documents responsive to this Request in response to the State’s First Requests for Production, to the extent such documents were relevant and within AECOM’s possession, custody, or control. To the extent the parties later resolve the scope of any additional email ESI collection, AECOM will collect, review, and produce any additional non-privileged, non-duplicative responsive documents identified through that process.

**REQUEST NO. 9:**

All documents relating to any other claims, lawsuits, administrative proceedings, or disputes involving Your inspection or design services for bridges with post-tensioned structural systems within the last ten (10) years.

**RESPONSE NO. 9:**

**Objection.** AECOM objects to this Request because it seeks documents that are not relevant to the claims or defenses in this action and are not proportional to the needs of the case. The Request broadly seeks documents relating to unrelated projects, unrelated bridges, unrelated clients, and unrelated claims, lawsuits, administrative proceedings, or disputes involving post-tensioned structural systems over a ten-year period, none of which concern the Washington Bridge or AECOM's work at issue in this litigation. AECOM further objects to this Request to the extent it seeks confidential or proprietary information or materials protected by the attorney-client privilege or the work-product doctrine.

**REQUEST NO. 10:**

All documents in Your possession relating to prior inspections, evaluations, or reports on the Washington Bridge performed by other entities prior to Your involvement, including but not limited to the Lichtenstein Report, MBI inspection reports, and reports from the 1996-1998 rehabilitation project.

**RESPONSE NO. 10:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks "*all documents in [AECOM's] possession*" relating to prior inspections, evaluations, or reports performed by other entities without reasonable limitation as to scope, time, or relevance. AECOM further objects to this Request to the extent it seeks documents that are already in the State's and/or RIDOT's possession, custody, or control, including documents generated by RIDOT or third-party consultants retained by the State, or that have already been produced by parties or third parties in this litigation. AECOM further objects to the extent this Request seeks documents not authored by AECOM and more readily accessible to the State from its own files or from the originating entities. AECOM further objects to the extent this Request seeks materials protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged documents responsive to this Request in response to the State's First Requests for Production. AECOM further states that it will produce additional non-privileged documents, if any, in its possession, custody or control, that were received by AECOM prior to or during its work on the Washington Bridge and that relate to prior inspections, evaluations, or reports of the Washington Bridge. However, AECOM will not re-produce documents that have been produced in this litigation by the State, other parties or third parties, that are only in AECOM's possession as a result of such productions in this litigation. To the extent AECOM has obtained additional such materials solely through discovery in this litigation, AECOM does not consider such documents to be within the scope

of this Request as drafted. To be clear, AECOM's production pursuant to this Request is limited to documents that were actually provided to or made available to AECOM during the time period AECOM performed services on the Washington Bridge.

**REQUEST NO. 11:**

All documents reflecting payments made by You to Your Subconsultants or Subcontractors for work performed on the Washington Bridge.

**RESPONSE NO. 11:**

**Objection.** AECOM objects to this Request because it seeks information that is not relevant to any claim or defense in this litigation and is not proportional to the needs of the case. The amounts, timing, or status of payments made by AECOM to its subconsultants or subcontractors do not bear on the allegations asserted by the State in its Amended Complaint or AECOM's defenses thereto. AECOM further objects to this Request as overly broad and unduly burdensome to the extent it seeks "*all documents reflecting payments*" without reasonable limitation as to time, form, or scope, and because responding would require collection and review of accounting and financial records unrelated to the issues in dispute. AECOM further objects to this Request to the extent it seeks confidential commercial or financial information.

**REQUEST NO. 12:**

All documents relating to Your quality assurance and quality control procedures for inspection and design services, including but not limited to procedures applied to work performed on the Washington Bridge.

**RESPONSE NO. 12:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks AECOM's quality assurance and quality control procedures for inspection and design services generally, rather than procedures relating to AECOM's work on the Washington Bridge. AECOM further objects to this Request to the extent it seeks confidential, proprietary, or commercially sensitive information unrelated to the Washington Bridge and/or materials protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, to the extent not previously produced, AECOM will produce non-privileged documents, if any, sufficient to reflect quality assurance and quality control procedures applied by AECOM in connection with AECOM's work on the Washington Bridge, to the extent such documents exist and are within AECOM's possession, custody, or control.

**REQUEST NO. 13:**

All documents relating to Your policies and procedures for inspecting post-tensioned bridge structures, including but not limited to procedures for inspecting post-tensioned cables, ducts, anchorage systems, and tie-down rods.

**RESPONSE NO. 13:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks AECOM's general policies and procedures for inspecting post-tensioned bridge structures on projects unrelated to the Washington Bridge. AECOM further objects to this Request to the extent it seeks confidential, proprietary, or commercially sensitive information unrelated to AECOM's work on the Washington Bridge and/or materials protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, AECOM will produce non-privileged documents, if any, sufficient to reflect procedures applied by AECOM in connection with AECOM's work on the Washington Bridge relating to the inspection of post-tensioned bridge elements, to the extent such documents exist and are within AECOM's possession, custody, or control.

**REQUEST NO. 14:**

All policies, procedures, manuals, guidelines, checklists, and standards used by You in performing bridge inspections, including but not limited to inspections of the Washington Bridge.

**RESPONSE NO. 14:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks all policies, procedures, manuals, guidelines, checklists, and standards used by AECOM in performing bridge inspections generally, rather than those relating to AECOM's work on the Washington Bridge. AECOM further objects to this Request to the extent it seeks confidential, proprietary, or commercially sensitive materials unrelated to the Washington Bridge and/or materials protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, AECOM will produce non-privileged documents, if any, sufficient to reflect the standards, procedures, manuals, guidelines, checklists, or similar materials applied by AECOM in connection with AECOM's work on the Washington Bridge, to the extent such documents exist and are within AECOM's possession, custody, or control.

**REQUEST NO. 15:**

All documents identifying the Subconsultant personnel who performed inspections of or work on the Washington Bridge on Your behalf, including their names, roles, qualifications, and the entity for which they worked.

**RESPONSE NO. 15:**

**Objection.** AECOM objects to this Request to the extent it is vague and overly broad and to the extent it seeks information more properly obtained through interrogatories rather than a request for production of documents, including narrative descriptions of individuals' roles or qualifications. AECOM further objects to this Request to the extent it seeks confidential personnel information, information not within AECOM's possession, custody, or control, or information protected by applicable privacy rights.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged subconsultant agreements and related documents in response to the State's First Requests for Production, which identify the subconsultant entities engaged by AECOM for work on the Washington Bridge. To the extent additional non-privileged documents exist that are sufficient to identify subconsultant personnel who performed inspections or other work on AECOM's behalf, AECOM will produce, if any, such documents, to the extent they are within AECOM's possession, custody, or control.

**REQUEST NO. 16:**

All documents relating to the supervision, oversight, or quality assurance/quality control of inspection or design work performed by You or Your Subconsultants on the Washington Bridge.

**RESPONSE NO. 16:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks "*all documents relating to*" supervision, oversight, or quality assurance/quality control without reasonable limitation as to time period, project phase, subject matter, or relevance to the claims and defenses at issue in this litigation. The Request impermissibly seeks broad categories of internal project management and quality-control materials untethered to any specific allegation in the State's Amended Complaint. AECOM further objects to the extent the Request seeks documents protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, to the extent not previously produced, AECOM will produce non-privileged documents, if any, sufficient to reflect project-specific supervision, oversight, or QA/QC activities for inspection or design work performed on the Washington Bridge, to the extent such documents exist and are within AECOM's possession, custody, or control.

**REQUEST NO. 17:**

All documents relating to the qualifications, certifications, and training of Your personnel who performed inspections or design services for the Washington Bridge, including but not limited to Professional Engineer licenses, bridge inspection certifications, and training on inspection of post-tensioned structures.

**RESPONSE NO. 17:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks “all documents” relating to qualifications, certifications, and training without reasonable limitation as to time, scope, or relevance to the work performed on the Washington Bridge. AECOM further objects to this Request to the extent it seeks confidential personnel information, information more properly sought by interrogatory, or information beyond what is relevant and proportional to the needs of the case under Rule 26 of the Rhode Island Superior Court Rules of Civil Procedure.

Subject to and without waiving the foregoing objections, to the extent not previously produced, AECOM will produce non-privileged documents, if any, sufficient to reflect the professional qualifications or credentials of relevant AECOM personnel who performed inspection or design services on the Washington Bridge, including curricula vitae and professional licensure information to the extent available. To be clear, AECOM does not agree to produce complete personnel files, personal identifying information, or expansive training records not maintained in the ordinary course of business or not specific to the Washington Bridge.

**REQUEST NO. 18:**

All documents and communications relating to concerns, warnings, or recommendations about the structural condition, safety, or integrity of the Washington Bridge made by or to You from January 1, 2010 to the present.

**RESPONSE NO. 18:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and vague. The terms “*concerns*,” “*warnings*,” and “*recommendations*” are undefined, inherently subjective, and susceptible to multiple interpretations, and the Request seeks “*all documents and communications*” from January 1, 2010 to the present without reasonable limitation as to subject matter, project phase, or relevance to the claims and defenses at issue in this litigation. AECOM further objects to the extent this Request seeks documents protected by the attorney-client privilege, work-product doctrine, joint-defense privilege, or common-interest doctrine. AECOM further objects to the extent this Request seeks ESI beyond the scope of the parties’ ESI Protocol and beyond the custodians, date ranges, search terms, and other collection parameters that are the subject of the parties’ ongoing meet-and-confer process.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged responsive documents, including documents identified

through its ESI collection and review process. To the extent the parties later resolve the scope of any additional email ESI collection, AECOM will collect, review, and produce any additional non-privileged, non-duplicative responsive documents identified through that process.

**REQUEST NO. 19**

All communications between You and any other defendant in this Lawsuit relating to the Washington Bridge, including but not limited to communications with the Joint Venture, VHB, MBI, Collins Engineers, TranSystems, and Jacobs Engineering.

**RESPONSE NO. 19:**

**Objection.** AECOM objects to this Request as overly broad, unduly burdensome, and not proportional to the needs of the case to the extent it seeks “*all communications*” between AECOM and any other defendant relating to the Washington Bridge without reasonable limitation as to subject matter, time period, or relevance to the claims and defenses at issue in this litigation. AECOM further objects to this Request to the extent it seeks communications protected by the attorney-client privilege, work-product doctrine, joint-defense privilege, and/or common-interest doctrine. AECOM further objects to the extent this Request seeks documents already produced in this litigation, duplicative of materials produced by other defendants, or otherwise equally available to the State. AECOM further objects to the extent this Request seeks ESI beyond the scope of the parties’ ESI Protocol and beyond the custodians, date ranges, search terms, and other collection parameters that are the subject of the parties’ ongoing meet-and-confer process.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged responsive documents, including those identified through its ESI collection and review process. To the extent the parties later resolve the scope of any additional email ESI collection, AECOM will collect, review, and produce any additional non-privileged, non-duplicative responsive documents identified through that process.

**REQUEST NO. 20:**

All documents relating to Your review or oversight of the rehabilitation plans issued by the Joint Venture for the Washington Bridge, including but not limited to reviews of VHB’s designs and any concerns or comments raised by You.

**RESPONSE NO. 20:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks “*all documents relating to*” AECOM’s review or oversight of rehabilitation plans without reasonable limitation as to time period, project phase, or subject matter, and therefore seeks materials beyond what is relevant and proportional to the needs of the case. AECOM further objects to the extent this Request seeks documents equally available to the State and/or RIDOT, including documents generated by or exchanged with RIDOT or the Joint Venture in the ordinary course of the Washington Bridge Rehabilitation Project. AECOM further objects to this Request to the extent it seeks documents protected

by the attorney-client privilege, work-product doctrine, joint-defense privilege, and/or common-interest doctrine. AECOM further objects to the extent this Request seeks ESI beyond the scope of the parties' ESI Protocol and beyond the custodians, date ranges, search terms, and other collection parameters that are the subject of the parties' ongoing meet-and-confer process.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged documents responsive to this Request in response to the State's First Requests for Production, including documents reflecting AECOM's review of and comments on rehabilitation plans and designs prepared by the Joint Venture and VHB. AECOM will not produce duplicative copies of documents already produced. To the extent the parties later resolve the scope of any additional email ESI collection, AECOM will collect, review, and produce any additional non-privileged, non-duplicative responsive documents identified through that process.

**REQUEST NO. 21:**

All documents relating to Your role as Owner's Representative or construction phase services provider under the 2019 Change Order, including but not limited to meeting minutes, progress reports, site visit reports, RFI responses, shop drawing reviews, and communications with the Joint Venture or RIDOT.

**RESPONSE NO. 21:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks "*all documents relating to*" AECOM's role as Owner's Representative or construction-phase services provider under the 2019 Change Order without reasonable limitation as to time period, project phase, subject matter, or relevance to the claims and defenses at issue in this litigation. AECOM further objects to this Request to the extent it seeks documents equally available to the State and/or RIDOT, including meeting minutes, progress reports, RFIs, shop drawings, and related communications generated or maintained by RIDOT or the Joint Venture in the ordinary course of the Washington Bridge Rehabilitation Project. AECOM further objects to this Request to the extent it seeks documents protected by the attorney-client privilege, work-product doctrine, joint-defense privilege, and/or common-interest doctrine. AECOM further objects to the extent this Request seeks ESI beyond the scope of the parties' ESI Protocol and beyond the custodians, date ranges, search terms, and other collection parameters that are the subject of the parties' ongoing meet-and-confer process.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged documents responsive to this Request in response to the State's First Requests for Production, including documents reflecting AECOM's construction-phase services and communications with RIDOT and the Joint Venture under the 2019 Change Order. AECOM will not produce duplicative copies of documents already produced. To the extent the parties later resolve the scope of any additional email ESI collection, AECOM will collect, review, and produce any additional non-privileged, non-duplicative responsive documents identified through that process.

**REQUEST NO. 22:**

All documents relating to the Base Technical Concept (BTC) prepared by You for the Design-Build procurement for the Washington Bridge, including all drafts, revisions, and supporting analyses.

**RESPONSE NO. 22:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks “all drafts, revisions, and supporting analyses” without reasonable limitation. AECOM further objects to the extent the Request seeks documents protected by the attorney-client privilege or work-product doctrine.

**Subject to and without waiving the foregoing objections, to the extent not previously produced, AECOM states that it will produce non-privileged documents responsive to this Request to the extent such documents exist and are within AECOM’s possession, custody, or control.**

**REQUEST NO. 23:**

All documents relating to Your scope of work, deliverables, and fee proposal for the 2019 Change Order, including all internal communications and analyses.

**RESPONSE NO. 23:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks “*all documents relating to*” AECOM’s scope of work, deliverables, and fee proposal for the 2019 Change Order, including “*all internal communications and analyses,*” without reasonable limitation as to subject matter or relevance to the claims and defenses at issue in this litigation. AECOM further objects to this Request to the extent it seeks internal deliberations, analyses, or communications concerning AECOM’s pricing, cost structure, or negotiation strategy, which are not relevant or proportional to the needs of the case and do not bear on the substantive allegations asserted by the State in its Amended Complaint. AECOM further objects to the extent this Request seeks documents equally available to the State and/or RIDOT, including the operative contract documents, approved scope of work, deliverables, and fee materials incorporated into or exchanged with RIDOT. AECOM further objects to the extent the Request seeks documents protected by the attorney-client privilege or work-product doctrine.

**Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged documents reflecting the agreed scope of work, deliverables, and fee terms for the 2019 Change Order, including executed contract documents and materials exchanged with RIDOT. AECOM will not produce internal communications, analyses, or drafts relating to its fee proposal or internal pricing considerations that have no relevance to the claims and defenses at issue in this litigation. AECOM will produce, if any, additional non-privileged, non-duplicative documents responsive to this Request, to the extent they exist, and are within AECOM’s possession, custody or control.**

**REQUEST NO. 24:**

All structural analyses, calculations, models, and engineering evaluations performed by or on behalf of You relating to the Washington Bridge, including but not limited to load rating analyses, capacity analyses, and seismic evaluations.

**RESPONSE NO. 24:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks “*all structural analyses, calculations, models, and engineering evaluations*” performed “*by or on behalf of*” AECOM without reasonable limitation as to time period, project phase, subject matter, or relevance to the claims and defenses at issue in this litigation. AECOM further objects to this Request to the extent it seeks draft analyses, preliminary calculations, internal models, expert materials, or other documents protected by the attorney-client privilege, work-product doctrine, or applicable expert-discovery limitations.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged documents responsive to this Request in response to the State’s First Requests for Production, including finalized structural analyses, calculations, and engineering evaluations prepared by AECOM in connection with its work on the Washington Bridge. AECOM will not produce duplicative copies of documents already produced. AECOM will produce any additional non-privileged, non-duplicative documents responsive to this Request, to the extent they exist, and are within AECOM’s possession, custody or control.

**REQUEST NO. 25:**

All documents relating to Your joint elimination study for the Washington Bridge, including but not limited to analyses of structural modeling and assessments of the impact of joint elimination on bridge components, including the Tie-Down Rods.

**RESPONSE NO. 25:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks “all documents relating to” AECOM’s joint elimination study without reasonable limitation as to time period, project phase, subject matter, or relevance to the claims and defenses at issue in this litigation. AECOM further objects to the extent this Request seeks documents equally available to the State and/or RIDOT, including materials generated by or exchanged with RIDOT or other project participants. AECOM further objects to the extent the Request seeks documents protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged documents responsive to this Request in response to the State’s First Requests for Production, including finalized analyses and materials relating to the joint elimination study for the Washington Bridge. AECOM will not produce duplicative copies of documents already produced. AECOM will produce, if any, additional non-

**privileged, non-duplicative documents responsive to this Request, to the extent they exist, and are within AECOM's possession, custody or control.**

**REQUEST NO. 26:**

All photographs taken by You or on Your behalf during any inspection or evaluation of the Washington Bridge from January 1, 2010 to the present, including metadata indicating the date, time, and location of each photograph.

**RESPONSE NO. 26:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks "*all photographs*" taken "during any inspection or evaluation" of the Washington Bridge from January 1, 2010 to the present, without reasonable limitation as to relevance, project phase, subject matter, or proportionality to the needs of the case. AECOM further objects to the extent this Request seeks metadata or other electronically stored information beyond that required to be produced under the Court-ordered ESI Protocol. AECOM further objects to the extent this Request seeks documents protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged responsive photographs in response to the State's First Requests for Production. AECOM will not reproduce photographs or metadata already produced. To the extent any additional non-privileged, non-duplicative responsive photographs exist and are within AECOM's possession, custody, or control, AECOM will produce such photographs in native format and with associated metadata fields required by the ESI Protocol, to the extent such metadata exists, in a manner consistent with the ESI Protocol.

**REQUEST NO. 27:**

All documents relating to each and every response that You prepared and/or submitted in response to, or in connection with, any request(s) for proposal relating to the Washington Bridge.

**RESPONSE NO. 27:**

**Objection.** AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks "*all documents relating to each and every response*" to any request for proposal relating to the Washington Bridge without reasonable limitation as to time period, subject matter, or relevance to the claims and defenses at issue in this litigation. AECOM further objects to the extent this Request seeks internal drafts, internal analyses, pricing or proposal strategy materials, or internal communications, which are not relevant or proportional to the needs of the case, or documents protected by the attorney-client privilege or work-product doctrine.

Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged documents responsive to this Request in response to the State's First Requests for Production, including final proposal materials submitted to the

**State or RIDOT. AECOM will not produce internal drafts, analyses, or duplicative documents already produced. AECOM will produce any additional non-privileged, non-duplicative documents responsive to this Request, to the extent they exist, and are within AECOM's possession, custody or control.**

**REQUEST NO. 28:**

All communications relating to each and every response that You prepared and/or submitted in response to, or in connection with, any request(s) for proposal relating to the Washington Bridge.

**RESPONSE NO. 28:**

**Objection. AECOM objects to this Request as overly broad and unduly burdensome to the extent it seeks “*all communications relating to each and every response*” prepared in response to any request for proposal relating to the Washington Bridge without reasonable limitation as to time period, subject matter, or relevance to the claims and defenses at issue in this litigation. AECOM further objects to the extent this Request seeks communications protected by the attorney-client privilege, work-product doctrine, joint-defense privilege, or common-interest doctrine. AECOM further objects to the extent this Request seeks ESI beyond the scope of the parties' ESI Protocol and beyond the custodians, date ranges, search terms, and other collection parameters that are the subject of the parties' ongoing meet-and-confer process.**

**Subject to and without waiving the foregoing objections, AECOM states that it has already produced non-privileged responsive communications identified through its ESI collection and review process. To the extent the parties later resolve the scope of any additional email ESI collection, AECOM will collect, review, and produce any additional non-privileged, non-duplicative responsive documents identified through that process.**

Respectfully submitted,

AECOM TECHNICAL SERVICES, INC.

By Its Attorneys,

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Dated: April 20, 2026

**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2026, I electronically filed and served this document through the electronic filing system on all counsel of record.

The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Amanda R. Prosek  
Amanda R. Prosek