



namely; agreements; communications, including intra-company communications; memos; statements; notes; correspondence; telegrams; memoranda; notices; records; books; summaries or records of telephone conversations; summaries or records of personal conversations or interviews; diaries; forecasts; statistical statements; accounts' work papers; graphs; charts; ledgers; journals; books or records of account; summaries of accounts; balance sheets; income statements; minutes or records of meetings or conferences; desk calendars; appointment books (including pocket appointment books); reports and/or summaries of interviews; reports and/or summaries of investigations; rough or scratch pad notes; records; reports or summaries of negotiations; studies; brochures; pamphlets; circulars; press releases; contracts; projections; drafts of any documents; working papers; marginal notations; photographs; drawings; checks (front and back); tape or video recordings; computer printouts; data processing input and output; microfilms; check stubs or receipts; and any other document or writing or whatever description.

As used herein, "document" means the original and any non-identical copy. Handwritten notations of any kind on the original or any copy of a document render same non-identical.

(2) The term "communication" means all oral conversations, discussions, letters, telegrams, memoranda, meetings, conferences, discussions, notes, internal memoranda, email, voicemail, facsimile, and any transmission of information in any form, both oral and written.

(3) The term "Plaintiff", or "State", or "you" or "your" shall mean the Plaintiff, State of Rhode Island and/or its agents and all other persons acting on its behalf.

(4) The term "RIDOT" means the Rhode Island Department of Transportation and includes departments, segments, divisions, subdivisions, administrative entities and bodies, and other related entities, both presently existing and those which previously existed of any of the foregoing entities, and any present or former officers, directors, employees, consultants, contractors, attorneys, and agents of the foregoing entity.

(5) The term "Defendant" or "TranSystems" refers to the defendant TranSystems Corporation.

(6) The term "Complaint" or "Amended Complaint" refers to the Amended Complaint filed by The State of Rhode Island on April 15, 2025, in the above-captioned lawsuit pending in the State of Rhode Island, Providence County Superior Court, docketed as C.A. No: PC-2024-04526.

(7) The term “Bridge” or “Washington Bridge” means the Interstate I-195 westbound Washington Bridge in Rhode Island, formally known as the Washington Bridge North No. 700, which was constructed in 1967 and opened to traffic in 1968.

(8) The term “Eastbound Washington Bridge” means the Interstate I-195 eastbound portion bridge structure over the Seekonk River connecting Providence, Rhode Island and East Providence, Rhode Island.

(9) These document requests are to be deemed continuing so as to require supplemental production if Plaintiff obtains or discovers further documents responsive to these requests after production has been made. Such supplemental production shall be made upon notice to Defendant’s attorneys within thirty (30) days after such further documents come into Plaintiff’s custody, possession or control or are discovered by Plaintiff, but in no event later than ten (10) days before the date set for trial or dispositive hearing.

(10) Plaintiff is to produce all documents in its possession, custody or control, including documents as to which the Defendants have the right to request actual possession.

(11) Each document produced in compliance with this request should be accompanied by an indication as to the particular paragraph(s) under which it is being introduced.

(12) If Plaintiff claims privilege for any document requested herein, provide the following information as to each such document:

- (a) the title, heading or caption of such document, if any;
- (b) the identifying number(s), letter(s), or combination thereof, if any, and the significance or meaning of such number(s), letter(s) or combination thereof;
- (c) the date appearing on such document and if no date appears thereon, the approximate date on which such document was prepared;
- (d) the general nature or description of such document (i.e., whether it is a letter, memorandum, minutes of meeting, etc.) and the number of pages of which it consists;
- (e) the name of the person who signed such document or, if it was not signed, the name of the person or persons who prepared it;

- (f) the name(s) of the person(s) to whom such document was addressed and the name of each person, other than the addressee(s), to whom such document, or a copy thereof, was sent;
- (g) the identity of the person who has custody of such document; and
- (h) a general summary of the substance of the document.

### **REQUESTS**

1. Any and all documentation of any kind or type, whether electronic and/or hard copies, regarding the plaintiff's adherence to the requirements to the National Bridge Inspection Program Compliance Review Manual (NBIP-CRM) for each year starting in 2011 until the closure of the Washington Bridge.

*/s/ Mark P. Dolan*

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 5<sup>th</sup> day of March, 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/ Mark P. Dolan*