

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 RESPONSE TO DEFENDANT TRANSYSTEMS CORPORATION'S  
THIRD REQUEST TO PRODUCE DATED MARCH 5, 2026**

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 Response to Defendant TranSystems Corporation's Third Request to Produce dated March 5, 2026:

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 (MBIP-CRM) for each year starting in 2011 until the closure of the Washington Bridge.

**RESPONSE: Please see Bates: RIDOT\_000676186-RIDOT\_000676490.**

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

/s/ Sarah W. Rice

Sarah W. Rice, Esq. (#10588)  
Assistant Attorney General  
Megan Rok, Esq. (#11098)<sup>1</sup>  
Special Assistant Attorney General  
Rhode Island Office of the Attorney General  
150 S. Main Street  
Providence, RI 02903  
Tel: (401) 274-4400  
[srice@riag.ri.gov](mailto:srice@riag.ri.gov)  
[mrok@riag.ri.gov](mailto:mrok@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:tleopold@cohenmilstein.com)  
[lkroeger@cohenmilstein.com](mailto:lkroeger@cohenmilstein.com)  
[dmartin@cohenmilstein.com](mailto:dmartin@cohenmilstein.com)  
[prazavi@cohenmilstein.com](mailto:prazavi@cohenmilstein.com)  
[trichardson@cohenmilstein.com](mailto:trichardson@cohenmilstein.com)  
[atoric@cohenmilstein.com](mailto:atoric@cohenmilstein.com)

/s/ Jonathan N. Savage

Jonathan N. Savage, Esq. (#3081)  
Michael P. Robinson, Esq. (#6306)  
Edward D. Pare III, Esq. (#9698)

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<sup>1</sup> Practicing under Article II, Rule 2(f) of the R.I. Supreme Court Rules Pending Admission to the Rhode Island Bar.

Savage Law Partners, LLP  
564 South Water Street  
Providence, RI 02903  
Tel: (401) 238-8500  
Fax: (401) 648-6748  
[js@savagelawpartners.com](mailto:js@savagelawpartners.com)  
[mrobinson@savagelawpartners.com](mailto:mrobinson@savagelawpartners.com)  
[epare@savagelawpartners.com](mailto:epare@savagelawpartners.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20th day of April 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
<b>FTP Password</b>	CONaHj0P1nLg=S	<a href="https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports">https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports</a>
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