

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 SECOND SET OF INTERROGATORIES TO PLAINTIFF STATE OF RHODE ISLAND

Pursuant to Rule 33 of the Rhode Island Superior Court Rules of Civil Procedure Defendant AECOM Technical Services, Inc. (“AECOM”) and the agreement of the parties’ agreeing to a total of sixty (60) interrogatories to be propounded by each party, by its undersigned counsel, hereby serves its Second Set of Interrogatories to Plaintiff, State of Rhode Island (“Plaintiff” or the “State”), and requests that the State answer under oath each of the following Interrogatories within forty-five (45) days of service of these Interrogatories.

INSTRUCTIONS

1. The State shall answer each question separately and fully in writing and under oath.
2. Answers to these interrogatories must include information known to the State. If the person or persons answering these interrogatories does not have enough information to answer any of the interrogatories, it is his or her duty to make a reasonable effort to obtain such information.
3. These interrogatories require supplemental or amended answers to the extent required by Rule 33 of the Rhode Island Rules of Civil Procedure.

4. When an objection is made to any interrogatory or subpart thereof, it shall state with specificity all grounds upon which the objecting party relies. If an interrogatory is objected to on the ground of attorney-client privilege or on the ground of attorney-work product or that the information requested was obtained to prepare in anticipation of litigation or for trial, sufficient information must be provided (i) to permit the subject matter, but not content, of the allegedly privileged information to be identified with sufficient specificity to allow a party to determine whether a motion to compel is warranted; and (ii) to explain the basis for the claim of privilege in order that a court can properly determine its propriety.

DEFINITIONS

1. The term “AECOM” refers to AECOM Technical Services, Inc., and its present or former employees, servants, attorneys, agents, consultants, and other representatives or persons acting on its behalf or under its control.

2. “And” shall include “or” and vice versa; the singular shall include the plural and vice versa; “any” includes the word “all” and “all” includes the word “any”; “each” includes the word “every” and “every” includes the word “each.”

3. “Amended Complaint” refers to the Amended Complaint filed by The State of Rhode Island on April 15, 2025, in the above-captioned lawsuit in the State of Rhode Island, Providence County Superior Court, docketed as *The State of Rhode Island v. AECOM Technical Services, Inc. et al*, Case No. PC-2024-04526.

4. “Communication(s)” means the transmittal of information (in the form of facts, idea, inquires, or otherwise).

5. “Document” means, without limitation, any written, printed, typed, photographed, recorded or otherwise reproduced or stored communication or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, or any combination thereof. This definition

includes copies or duplicates of documents contemporaneously or subsequently created which have any non-conforming notes or other markings and the backsides of any communication or representation which all contain any of the above.

6. “Include” or “including” means including but not limited to.
7. The term “Interrogatories” refers to the below Interrogatories.
8. The terms “referring to”, “relating to”, or “concerning” shall be broadly construed to mean referring to, describing, evidencing, or constituting.
9. The terms the “State”, “State of Rhode Island”, “You”, and “Your” refer to the State of Rhode Island, and its present or former employees, servants, attorneys, agents, consultants, and other representatives or persons acting on its behalf or under its control.
10. Capitalized terms not defined herein have the meanings given to them in the Amended Complaint.

INTERROGATORIES

30. For each Request for Admission served by AECOM to which the State responded with anything other than an unequivocal admission, state and identify with specificity:
 - a. the number of the Request for Admission;
 - b. all facts the State relies upon to support its response;
 - c. all Documents and Communications supporting the basis of the State’s response;
 - d. individuals with knowledge concerning the facts underlying the State’s response;
and
 - e. if the denial was based in whole or in part on a claimed lack of information, a description of all steps the State undertook to make a reasonable inquiry before issuing the denial, including the identity of all persons consulted and the sources reviewed.

31. Identify and describe the “bridge structure file” referenced throughout the State’s Amended Complaint and Answers to AECOM’s First Set of Interrogatories, including:

- a. the name and title of the custodian(s) responsible for maintaining the “bridge structure file;
- b. the format(s) in which the “bridge structure file” is maintained (*e.g.*, paper, electronic database; software type);
- c. the location(s) where the “bridge structure file” is stored; and
- d. a list identifying each document contained within the “bridge structure file,” including document title and date, and if applicable bates numbers/ranges.

32. In your response to Request for Admission number 9, the State states, in part that “...AECOM had an obligation to,...(b) perform Construction Phase Services, which included, among other things, coordinating with the RIDOT project manager and design-build team during the final design process and reviewing the design-build team’s submissions to ensure that they satisfy the technical requirements set forth in the RFP documents and the Scope of Work prepared/created/developed by AECOM.” Is it your contention that this work was design work conducted by AECOM or that AECOM otherwise was the designer of record for the design of the design/builder? If yes, please explain your answer in detail.

33. In your response to Request for Admission number 23, describe who at RIDOT contemporaneously reviewed and commented upon the inspection reports provided by AECOM to RIDOT for the Washington Bridge, and what their credentials were, including degrees held/earned, professional licenses and training and certifications relating to bridges or structures.

34. Where in the contract documents, RFPs and other contractual materials between AECOM and the State involving the Washington Bridge, were the tie-down rods located at Piers

7 & 8 on said bridge, identified or called out as being fracture critical, requiring specific inspection or were otherwise considered non-reduced steel tension members (NSTMs).

35. In your response to Request for Admission No. 59, identify with specificity the work that Cardi Corporation did and did not complete under its construction contract, inclusive of what work was left incomplete and for what duration.

AECOM TECHNICAL SERVICES, INC.

By Its Attorneys,

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Dated: March 3, 2026

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 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