

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 COLLINS ENGINEERS, INC’S
FIRST REQUEST TO PRODUCE DATED FEBRUARY 24, 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 Responses to Defendant Collins Engineers, Inc’s First Request to Produce dated February 24, 2026:

Preliminary Statement and General Objections

These responses are made pursuant to Rule 34 of the Rhode Island Superior Court Rules of Civil Procedure and are subject to the following general objections, which are incorporated into each individual response below as though fully set forth therein:

1. The Plaintiff objects to each Request to the extent it seeks documents, communications, and/or information protected from disclosure by the attorney-

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client privilege or the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure.

2. The Plaintiff objects to each Request to the extent it is overly broad, unduly burdensome, or seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.
 3. The Plaintiff objects to each Request to the extent it seeks information equally available to the requesting party or already in requesting party's possession, custody, or control.
 4. The Plaintiff objects to any defined terms or instructions to the extent they purport to impose obligations beyond those required by the Rhode Island Superior Court Rules of Civil Procedure.
 5. No response herein shall be deemed an admission as to the relevance, materiality, or admissibility of any document or information referenced in any Request.
 6. The Plaintiff reserve the right to amend, modify or supplement these responses as additional documents are identified through ongoing discovery process in this matter.
1. Please produce all documents relating to the design or construction of Washington Bridge.

RESPONSE: Please see BATES: RIDOT_00000001–RIDOT_000447724.

2. Please produce all documents relating to the inspection or assessment of the Washington Bridge, including but not limited to all inspection reports and underlying materials supporting the same.

RESPONSE: Please see BATES:

RIDOT_000299794- RIDOT_000299925
RIDOT_000299926- RIDOT_000300274
RIDOT_000300275- RIDOT_000300539
RIDOT_000300540- RIDOT_000301046
RIDOT_000301047- RIDOT_000301421
RIDOT_000301422- RIDOT_000301739
RIDOT_000301740- RIDOT_000302313
RIDOT_000301740- RIDOT_000302313
RIDOT_000304129- RIDOT_000305355
RIDOT_000302314- RIDOT_000302749
RIDOT_000302750- RIDOT_000303190
RIDOT_000303191- RIDOT_000303482
RIDOT_000243825- RIDOT_000243847
RIDOT_000303542- RIDOT_000304128

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RIDOT_000064797-RIDOT_000064825 RIDOT_000243796-RIDOT_000243824
RIDOT_000243848-RIDOT_000243873 RIDOT_000243771-RIDOT_000243795
RIDOT_000305356- RIDOT_000306003

3. Please produce all documents relating to the maintenance of the Washington Bridge.

RESPONSE: Please see BATES: RIDOT_000000001– RIDOT_000447724.

4. Please produce all documents relating to the repair or rehabilitation of the Washington Bridge, including but not limited to all documents related to any decisions to forego repairs or rehabilitation.

RESPONSE: Please see BATES: RIDOT_000000001–RIDOT_000447724.

5. Please produce all documents relating to the closure of the Washington Bridge in December 2023.

RESPONSE: Please see BATES: RIDOT_000004279; RIDOT_000040671–RIDOT_000040672; RIDOT_000123390–RIDOT_000123399; RIDOT_000124055–RIDOT_000124067.

6. Please produce all reports, analyses, assessments, evaluations, or other documents relating to the condition, capacity, or structural integrity of the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Please see the Plaintiff's Response to Request Nos. 2 and 7 through 10, which collectively address responsive documents concerning the condition, capacity, and structural integrity of the Washington Bridge. Please see also the Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel.

7. Please produce all load rating reports, analyses, assessments, evaluations, or other similar documents for the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Please see attached PDF, produced contemporaneously and titled, "Load Rating, and also provided in Excel format via email to counsel. Additionally, please see Production 22 with corresponding BATES: RIDOT_000427123-RIDOT_000447724.

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8. Please produce all reports, analyses, assessments, or other similar documents for fracture-critical members or non-redundant steel tension members for the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Please see the Plaintiff's Response to Requests Nos. 2, 6, and 7.

9. Please produce all material testing reports, analyses, assessments, or other similar documents for the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Please see the Plaintiff's Response to Request Nos. 2 and 6. See also BATES: RIDOT_000000475–RIDOT_000000797;RIDOT_000001290 – RIDOT_000001292;RIDOT_0000048018;RIDOT_000048057- RIDOT_000048059;RIDOT_000048963;RIDOT000049088;RIDOT000242659- RIDOT_000242660;RIDOT_000246791-RIDOT_000246937;RIDOT_000248928- RIDOT_000249236.

10. Please produce all reports, analyses, assessments, or other similar documents for agency-defined elements for the Washington Bridge, including all underlying documents supporting the same.

RESPONSE: Please see the Plaintiff's Response to Request No. 6. See also BATES: RIDOT_000000001–RIDOT_000447724.

11. Please produce all contracts and agreements between Collins and the State relating to the Washington Bridge, including but not limited to, all contracts and agreements relating to Collins' 2017 Inspection of the Washington Bridge referenced in Paragraph 146 of the Amended Complaint.

RESPONSE: Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel.

12. Please produce all documents that were provided or made available to Collins in connection with Collins' 2017 inspection of the Washington Bridge.

RESPONSE: Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel.

13. Please produce all documents that Collins provided or made available to the State in connection with Collins' 2017 inspection of the Washington Bridge and the underlying materials supporting the same.

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RESPONSE: Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel.

14. Please produce all documents relating to amounts paid to Collins in connection with Collins' 2017 inspection of the Washington Bridge.

RESPONSE: Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel.

15. Please produce all documents relating to the Washington Bridge's post-tensioned cantilever beams and post-tensioning system, including but not limited to, all documents relating to the deterioration of such beams and system.

RESPONSE: Please see the Plaintiff's Response to Request Nos. 6 and 34. See also BATES: RIDOT_00000001–RIDOT_000447724.

16. Please produce all documents relating to the Washington Bridge's tie-down rods, including but not limited to, all documents relating to the tie-down rods failing, fracturing, or otherwise being compromised.

RESPONSE: Please see the Plaintiff's Response to Request Nos. 6 and 33. See also BATES: RIDOT_00000001–RIDOT_000447724.

17. Please produce all policies, procedures, guidelines, instructions, requirements, protocols, and other similar documents related to the inspection, repair, or rehabilitation of the Washington Bridge, including but not limited to, all such documents governing Collins' 2017 inspection of the Washington Bridge.

RESPONSE: Please see BATES: RIDOT_00000001–RIDOT_000447724.

18. Please produce all photographs and videos of the Washington Bridge.

RESPONSE: Please see BATES: RIDOT_00000001–RIDOT_000447724.

19. Please produce the original design plans, specifications, structural calculations, shop drawings, and other similar documents for the Washington Bridge.

RESPONSE: Please see BATES: RIDOT_000299794–RIDOT_000301421.

20. Please produce all inspection, maintenance, and repair documents related to the Washington Bridge, including but not limited to, repair records, inspection reports, condition assessments, safety evaluations, compliance certificates, service records,

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work orders, maintenance schedules, inspection checklists, daily reports, weekly reports, monthly reports, and time sheets.

RESPONSE: Please see the Plaintiff's Responses to Request Nos. 2, 3, and 4, which collectively address responsive inspection, maintenance, and repair documents. See also BATES: RIDOT_00000001–RIDOT_000447724.

21. Please produce all documents relating to budgets or estimates for inspection, maintenance, repair, or rehabilitation costs associated with the Washington Bridge.

RESPONSE: Please see BATES: RIDOT_00000001–RIDOT_000447724.

22. Please produce all documents relating to inspection, maintenance, repair, or rehabilitation costs that were incurred for the Washington Bridge.

RESPONSE: Please see the Plaintiff's Response to Request No. 21. See also BATES: RIDOT_00000001–RIDOT_000447724.

23. Please produce all documents relating to the Lichtenstein Report referenced in the Amended Complaint.

RESPONSE: Please see BATES: RIDOT_000049921–RIDOT_000050804.

24. Please produce all documents relating to the 1996-1998 rehabilitation of the Washington Bridge referenced in the Amended Complaint.

RESPONSE: Please see BATES: RIDOT_000022354–RIDOT_000022482; RIDOT_000246955–RIDOT_000246959; RIDOT_000022877–RIDOT_000022879.

25. Please produce all documents relating to or supporting paragraphs 46-65 in the Amended Complaint.

RESPONSE: Plaintiff objects to this Request as overbroad insofar as it encompasses twenty paragraphs of the Amended Complaint spanning a wide range of allegations without reasonable limitation as to the categories of documents sought. Subject to and without waiving the foregoing objections, please see BATES: RIDOT_00000001–RIDOT_000447724.

26. Please produce all documents relating to the Cardi Corporation Contract referenced in the Amended Complaint.

RESPONSE: Please see BATES: RIDOT_000019209–RIDOT_000019305.

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27. Please produce all documents relating to or evidencing the "known deteriorating condition of the Washington Bridge" as alleged in paragraph 71 of the Amended Complaint, including but not limited to documents establishing when such condition was first known to the State.

RESPONSE: Plaintiff objects to this Request as overbroad insofar as it seeks "all documents" relating to the "known deteriorating condition" of the Washington Bridge without reasonable limitation as to time period or category of documents. Subject to and without waiving the foregoing objections, please see BATES: RIDOT_00000001–RIDOT_000447724.

28. Please produce all inspection contracts and inspection reports, including all underlying materials supporting the same, referenced in paragraph 74 of the Amended Complaint.

RESPONSE: Please see Response to Interrogatory No. 2 and BATES: RIDOT_000014963–RIDOT_000022353.

29. Please produce all documents relating to or supporting paragraphs 76-91 in the Amended Complaint.

RESPONSE: Plaintiff objects to this Request as overbroad insofar as it encompasses sixteen paragraphs of the Amended Complaint spanning a wide range of allegations without reasonable limitation as to the categories of documents sought. Subject to and without waiving the foregoing objections, please see BATES: RIDOT_00000001–RIDOT_000447724.

30. Please produce all documents relating to or supporting the alleged "existence of unaddressed voids, poor grout, moisture, and corrosion, resulting in widespread deterioration of the post-tensioning system," as alleged in paragraph 95 of the Amended Complaint.

RESPONSE: Plaintiff objects to this Request as overbroad insofar as it seeks "all documents" without reasonable limitation as to time period. Subject to and without waiving the foregoing objections, please see BATES: RIDOT_00000001–RIDOT_000447724.

31. Please produce all documents relating to alleged wear and tear damage to the Eastbound Washington Bridge.

RESPONSE: Plaintiff objects to this Request as overbroad insofar as it seeks "all documents" without a reasonable limitation as to time period. Subject to and without waiving the foregoing objections, please see previously produced BATES: RIDOT000049738-RIDOT000049852.

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32. Please produce all documents relating to repair recommendations for the Washington Bridge.

RESPONSE: Plaintiff objects to this Request as overbroad insofar as it seeks "all documents" without a reasonable limitation as to time period. Subject to and without waiving the foregoing objections, please see the Plaintiff's Response to Request No. 4. See also BATES: RIDOT_00000001-RIDOT_000447724.

33. Please produce all inspections of the tie-down rods for the Washington Bridge.

RESPONSE: Please see Response to Interrogatory No. 2.

34. Please produce all inspections of the post-tensioned cantilever beams for the Washington Bridge.

RESPONSE: Please see Response to Interrogatory No. 2.

35. Please produce all documents relating to Wiss, Janney, Elstner Associates, Inc.'s ("WJE") April 5, 2024 report concerning the Washington Bridge, including but not limited to, all documents referenced in such report, all documents WJE reviewed or relied upon in connection with such report, all communications regarding such report or the analyses therein, and all documents provided to WJE in connection with such report.

RESPONSE: Plaintiff objects to this Request for Production to the extent that it seeks information that is protected by the attorney-client privilege, the work product doctrine set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Subject to and without waiving the foregoing objections, please see BATES: WJE_00000001-WJE_00152702.

36. Please produce all documents relating to or supporting the allegations in the following paragraphs of the Amended Complaint involving the Eastbound Washington Bridge:

- a. Paragraph 101 of the Amended Complaint that "westbound traffic was rerouted."
- b. Paragraph 102 of the Amended Complaint that "increased traffic volume has resulted in physical wear and tear damage" to the Eastbound Washington Bridge.
- c. Paragraph 103 of the Amended Complaint that "[d]ue to the increased traffic volume on the Eastbound Washington Bridge since the emergency closure of

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- the Washington Bridge, there has been wear and tear to the Eastbound Washington Bridge that would not have otherwise occurred."
- d. Paragraph 105 of the Amended Complaint that "physical maintenance is required on a more frequent basis to keep the Eastbound Washington Bridge in safe operating condition."
 - e. Paragraph 106 of the Amended Complaint that "the State has had to install advanced monitoring systems, including real-time sensors and structural health monitoring equipment, to track the structural health and integrity of the Eastbound Washington Bridge in order to ensure ongoing public safety."

RESPONSE: Plaintiff objects to this Request for Production to the extent that it seeks information that is protected by the attorney-client privilege, the work product doctrine set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. Without waiving the same, please see BATES: RIDOT_000049738-RIDOT_000049852. The Plaintiff reserves the right to supplement this response.

37. Please produce all documents relating to the condition of the Eastbound Washington Bridge, including but not limited to whether it is safe for travel and if there are any public safety concerns related to the Eastbound Washington Bridge.

RESPONSE: Plaintiff objects to this Request as overbroad and vague insofar as it seeks "all documents" relating to the "condition of the Eastbound Washington Bridge" without reasonable limitation as to subject matter or category of documents and what is meant by documents relating to the safety of the bridge for travel or public safety concerns.

38. Please produce all documents relating to or supporting the State's determination that the Washington Bridge was beyond repair and needed to be demolished.

RESPONSE: Plaintiff objects to this Request for Production to the extent that it seeks information that is protected by the attorney-client privilege, the work product doctrine set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. The Plaintiff further objects to this Request for Production as prematurely seeking the Plaintiff's experts' opinions. The Plaintiff will comply with the Court's Scheduling Order with regard to the identification of testifying expert witnesses.

39. Please produce all documents relating to or supporting the allegations in paragraph 148 of the Amended Complaint that Collins "breached its inspection contract."

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RESPONSE: Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel. See also BATES: RIDOT_00000001-RIDOT_000447724.

40. Please produce all documents relating to or establishing the duties alleged in paragraphs 151 and 152 of the Amended Complaint.

RESPONSE: Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel. See also BATES: RIDOT_00000001-RIDOT_000447724.

41. Please produce all documents relating to or supporting the allegations in paragraph 152 of the Amended Complaint that Collins "breached its duty of care."

RESPONSE: Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel. See also BATES: RIDOT_00000001-RIDOT_000447724.

42. Please produce all documents supporting the allegations and referenced in the Amended Complaint.

RESPONSE: Plaintiff objects to this Request as overbroad insofar as it seeks "all documents" supporting all allegations in the Amended Complaint without reasonable limitation as to subject matter or category of documents. Plaintiff further objects to this Request as duplicative of the more specific document requests set forth in Request Nos. 1 through 41, which collectively seek documents supporting the allegations in the Amended Complaint. Subject to and without waiving the foregoing objections, please see BATES: RIDOT_00000001-RIDOT_000447724.

43. Please produce all documents supporting or relating to the State's claims for damages, including but not limited to, the State's allegation in the Amended Complaint that it has suffered "millions of dollars in damages."

RESPONSE: Plaintiff objects to this Request for Production to the extent that it seeks information that is protected by the attorney-client privilege, the work product doctrine set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure. The Plaintiff

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further objects to this Request for Production as prematurely seeking the Plaintiff's experts' opinions. The Plaintiff will comply with the Court's Scheduling Order with regard to the identification of testifying expert witnesses. Subject to and without waiving same, See BATES RIDOT_000049853-RIDOT_000049920.

44. All documents referenced in any of the State's discovery responses or answers in this Action.

RESPONSE: Plaintiff objects to this Request as overbroad and disproportionate to the needs of the case under Rule 26(b)(1) of the Superior Court Rules of Civil Procedure insofar as it seeks "all documents" referenced in any discovery response without reasonable limitation. Plaintiff further objects to this Request as duplicative of the preceding Requests, which collectively encompass the documents referenced in the State's discovery responses. Subject to and without waiving the foregoing objections, please see BATES: RIDOT_000000001-RIDOT_000447724.

45. All documents the State intends to introduce, use, or rely upon in the Action, including but not limited to, all documents that the State intends to introduce, use, or rely upon at any hearing or at trial.

RESPONSE: The Plaintiff objects to this Request as prematurely seeking production of the exhibits that the Plaintiff may introduce at trial. Subject to said objection and without waiving same, please see BATES: RIDOT_000000001-RIDOT_000447724.

46. All documents related to, used, or considered by each expert the State intends, expects, or may call as a witness, including any opinion rendered, any documents upon which each opinion is based, any documents considered by each expert in formulating each opinion, any documents authored or contributed to and all presentations given or participated in by such expert, all documents that the State has provided to or made available to each expert, and all documents that each expert has shown to the State.

RESPONSE: The Plaintiff objects to this Request to the extent it prematurely seeks disclosure of experts the Plaintiff may engage in this action, or that may be protected by the attorney-client privilege, work product doctrine, or other applicable protections. The Plaintiff will supplement this response in accordance with the Court's scheduling order governing disclosure of expert witnesses to be called at trial.

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Plaintiff,
State of Rhode Island,
By its Attorneys,

/s/ Sarah W. Rice

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/s/ Theodore J. Leopold

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

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th 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

Load Rating

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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 RESPONSES TO DEFENDANT COLLINS ENGINEERS INC’S FIRST SET OF INTERROGATORIES DATED FEBRUARY 24, 2026

Pursuant to Rule 33 of the Rhode Island Superior Court Rules of Civil Procedure, now comes the Plaintiff, the State of Rhode Island (the “Plaintiff” or “State”), and hereby submits the following responses to Defendant Collins Engineers, Inc.’s First Set of Interrogatories dated February 24, 2026.

GENERAL OBJECTIONS

The State interposes the following General Objections, which are incorporated by reference into each response below as though fully set forth therein:

1. The State objects to each Interrogatory to the extent it seeks information protected by the attorney-client privilege or the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure, and/or the protections from disclosure afforded to non-testifying experts employed in anticipation of litigation or preparation for trial as set forth in Rule 26(b)(4) of the Superior Court Rules of Civil Procedure.
2. The State objects to each Interrogatory to the extent it prematurely seeks the opinions, analyses, or conclusions of the State's testifying or non-testifying experts.
3. The State objects to each Interrogatory, together with its subparts, to the extent that it constitutes separate questions for purposes of Rule 33(b) of the Superior Court Rules of Civil Procedure.

The State's responses are made subject to and without waiving the foregoing General Objections, and with a full reservation of all rights, privileges, and objections. The State's investigation is ongoing, and the State reserves the right to supplement each response as discovery continues and additional information is obtained, in accordance with its obligations under the Superior Court Rules of Civil Procedure.

1. Identify and describe in detail the relationship to the State of each person who prepared or assisted in the preparation of the answers to any of these interrogatories.

RESPONSE: Loren Doyle, John Preiss, P.E., and Anthony Pompei., PMP.

2. Identify all documents relating to and persons involved in Collins' 2017 Inspection of the Washington Bridge, and for each identified person describe in detail how that person was involved, provide the time period of that person's involvement, and provide that person's role and job responsibilities.

RESPONSE:

The Plaintiff objects to this Interrogatory to the extent it calls for information within the possession, custody, or control of Collins. Subject to said objections and without waiving same, the State responds as follows:

Collins conducted a routine inspection of the Washington Bridge between June 19, 2017 and July 24, 2017 under a 2014 inspection contract (Contract No. 2014-EB-003). The Washington Bridge's superstructure was rated "4 – Poor" in the July 24, 2017 routine inspection report prepared by Collins Engineers, Inc.

Information regarding the specific Collins personnel involved in the 2017 inspection, their roles, and their respective time periods of involvement is within Collins' own possession, custody, and control. From RIDOT's perspective, the primary RIDOT personnel overseeing bridge inspections during that period included David Cluley, P.E., Managing Engineer of the Bridge Inspection Unit in the Bridge Engineering

Section at RIDOT. Vito Georgeo checked the inspection into BRM, and Matt Quinlan gave a QA check on October 16, 2017.

Pursuant to Rule 33(d) of the Superior Court Rules of Civil Procedure, please see the documents produced and Bates-labeled accordingly, including Collins' 2017 inspection report and related correspondence. See BATES: RIDOT_000014963–RIDOT_000015000; RIDOT_000015707–RIDOT_000015712. Discovery is ongoing, and investigation continues, and the State reserves the right to supplement this response accordingly.

3. Describe in detail all claimed problems or issues related to the Washington Bridge's tie-down rods, including but not limited to, (i) providing a detailed description of such problems or issues; (ii) providing all facts demonstrating the existence of such problems or issues; (iii) stating when and how the State learned of such problems or issues; (iv) stating whether, when, and how the State informed Collins of such problems or issues; (v) identifying all persons involved with or having knowledge of such problems or issues; and (vi) identifying all documents related to such problems or issues.

RESPONSE: Subject to and without waiving the General Objections, the State responds as follows:

(i) The Washington Bridge utilized tie-down rods to secure each unbalanced cantilever beam. The tie-down rods were critical to the stability of the Washington Bridge. In December 2023, it was discovered that several of the steel tie-down rods—critical to the bridge's stability—had fractured. The fractured tie-down rods exhibited significant section loss and corrosion. Together, the tie-down rods and the post-tensioned cantilever beams were critical to the stability—and safety—of the Washington Bridge.

(ii) The existence of the fractured and deteriorated tie-down rods was confirmed through observations made during the Barletta/Aetna Joint Venture's rehabilitation work, which led to the emergency closure of the Washington Bridge on December 11, 2023. Subsequent investigation revealed that the tie-down rods at Pier 6 and Pier 7 had suffered section loss.

(iii) The State learned of the fractured tie-down rods in December 2023. Based on observations made during the Joint Venture's rehabilitation work, RIDOT issued an emergency declaration on December 11, 2023, at 3:00 p.m., closing the Washington Bridge. From 1967 through the bridge's emergency closure, RIDOT hired experts and consultants to conduct inspections or perform maintenance on the Washington Bridge. RIDOT reasonably and justifiably relied on these experts, including Collins, to identify any issues with the Washington Bridge's stability and to provide RIDOT with that information. None did so.

(iv) The State did not specifically inform Collins of problems with the tie-down rods prior to the emergency closure in December 2023, because, as alleged in the Amended Complaint, Collins and the other inspection firms failed to recognize the existence and

significance of the tie-down rods during their inspections of the Washington Bridge. The Original Design Plans, which were made available to all interested bidders in connection with RIDOT's Request for Proposals, would and should have revealed to Collins not only the existence of the tie-down rods but also their significance to the structure's stability, integrity, and safety.

(v) The State is continuing to identify all people with knowledge of these issues. At a minimum, this includes personnel from the various engineering firms that inspected or performed work on the Washington Bridge. The State reserves the right to supplement this response.

(vi) Pursuant to Rule 33(d) of the Superior Court Rules of Civil Procedure, please see BATES: RIDOT_000000001–RIDOT_000447926. Discovery is ongoing, and investigation continues, and the State reserves the right to supplement this response accordingly.

4. Describe in detail all claimed problems or issues related to the Washington Bridge's post-tensioned cantilever beams and post-tensioning system, including but not limited to, (i) providing a detailed description of such problems or issues; (ii) providing all facts demonstrating the existence of such problems or issues; (iii) stating when and how the State learned of such problems or issues; (iv) stating whether, when, and how the State informed Collins of such problems or issues; (v) identifying all persons involved with or having knowledge of such problems or issues; and (vi) identifying all documents related to such problems or issues.

RESPONSE: Subject to and without waiving the General Objections, the State responds as follows:

(i) The Original Design of the Washington Bridge incorporated the use of post-tensioned cables in concrete beams used throughout the bridge. The post-tensioned cables were used to construct post-tensioned concrete beams, which, when working properly, provided stability to the bridge and prevented the beams from cracking when carrying live traffic loads. The assembly of the post-tensioned concrete beams included the insertion of grout to protect steel cables within the concrete. Voids in the grout are, on their own, cause for serious concern. When coupled with severe corrosion of the cables themselves, voids in the grout can severely compromise the integrity of the prestressed, post-tensioned concrete beams.

(ii) As early as 1992, the Lichtenstein Report disclosed several important concerns with the Washington Bridge, including deterioration at the ends of the concrete drop-in beams, signs of distress in the stressing pocket and precast shoulders of the cantilever beams, and concern about corrosion from moisture and salt exposure in the post-tensioning cables in the post-tensioned cantilever beams. The 1996 rehabilitation project incorporated the findings of the Lichtenstein Report to address the problems noted in the Lichtenstein Report. In connection with the rehabilitation project between 1996 and 1998, significant deterioration was discovered in the

supports of the cantilever drop-in beam connections, as well as voids in the grout encasing and protecting the cables in the post-tensioned cantilever beams. Retrofit grouting was performed to address the issues. Subsequent investigation after the December 2023 closure revealed the existence of unaddressed voids, poor grout, moisture, and corrosion, resulting in widespread deterioration of the post-tensioning system, critical to the safety and structural integrity of the bridge.

(iii) The State learned of the initial concerns with the post-tensioning system through the Lichtenstein Report in January 1992 and during the 1996–1998 rehabilitation project. Testing was performed in 1993/1994 as part of the development for the 1996 rehabilitation contract, including GPR, concrete testing for compressive strength, chloride ion, pH and half-cell testing, and post-tensioning inspection and testing. However, the full extent of the deterioration of the post-tensioning system was not discovered until after the emergency closure in December 2023.

(iv) Collins was provided with or had access to prior inspection reports and the bridge structure file in connection with its 2017 inspection, which contained information regarding the post-tensioned cantilever beams and post-tensioning system, including previous concerns noted in the Lichtenstein Report and the results of the 1996–1998 rehabilitation. The State contends that Collins should have conducted a detailed research and review of the bridge structure file, including prior inspection reports, drawings, and plans, in preparation for its 2017 inspection, which would have revealed the known history of problems with the post-tensioning system.

(v) The State is continuing to identify all persons with knowledge of these issues. At a minimum, this includes personnel from the various engineering firms that inspected or performed work on the Washington Bridge. The State reserves the right to supplement this response.

(vi) Pursuant to Rule 33(d) of the Superior Court Rules of Civil Procedure, please see BATES: RIDOT_000012781–RIDOT_000012822 (Lichtenstein Report); RIDOT_000022354–RIDOT_000022482 (1996–1998 rehabilitation project records); RIDOT_000049921–RIDOT_000050804 (MBI 2011 inspection report); RIDOT_000044622; RIDOT_000063199–RIDOT_000063429 (AECOM Final Technical Evaluation Report).

5. Identify all contracts between Collins and the Plaintiff relating to Collins' 2017 Inspection of the Washington Bridge, state the specific provisions of such contracts Collins allegedly breached, describe in detail how Collins allegedly breached such contracts, identify all persons with knowledge or involvement in such alleged breaches, and identify all documents related to such alleged breaches.

RESPONSE: The State and Collins are parties to a 2014 inspection contract. Collins conducted an inspection of the Washington Bridge on July 24, 2017 under the 2014 inspection contract.

Collins breached the inspection contract by, inter alia, failing to (a) conduct a detailed research and review of the bridge structure file for the Washington Bridge, including but not limited to, previous inspection reports, drawings, and plans; (b) conduct an inspection of the Washington Bridge in conformance with the inspection contract; (c) perform evaluations and report to the State as required by the contract; (d) recommend needed repairs in accordance with the requirements of the contract; and (e) otherwise comply with its contractual obligations.

Collins' obligations under the 2014 inspection contract incorporated, among other things, adherence to the 2013 edition of the Rhode Island Department of Transportation's Bridge Inspection Manual, which provides, in relevant part, that "[p]rior to the bridge inspection, the team leader"—that is, "the individual who performs the field inspection of an individual bridge"—"is responsible for planning and preparing for the inspection, which includes reviewing the bridge structure file and evaluating any bridge site conditions."

Collins' obligations also included adherence to all applicable State and Federal laws and regulations, including: (a) the duty to perform services only in the areas of their competence according to current standards of technical competence; (b) the duty to recognize their responsibility to the public; (c) the duty to truthfully represent past accomplishments incident to the solicitation of business; (d) the obligation to rebuild, repair, restore, and make good all losses, injuries, or damages; and (e) the obligation to be responsible for all damage or injury to public or private property resulting from any act, omission, neglect, or misconduct.

Collins failed to comply with, or breached, these provisions by failing to conduct a proper or reasonably adequate research and review of the bridge structure file for the Washington Bridge, including but not limited to previous inspection reports, drawings, and plans, and by failing to notify the State of those areas that constituted a threat to public safety so that adequate measures could be taken.

In failing to conduct a proper or reasonably adequate detailed research and review of the bridge structure file for the Washington Bridge, Collins failed to recognize not only the existence or condition of the tie-down rods, but also their significance to the stability, integrity, and safety of the structure; failed to evaluate, investigate, or recommend an investigation into or evaluation of the cause of the cracks in the concrete webs that ran parallel to the post-tensioning ducts; failed to evaluate, investigate, or recommend an investigation into the previous issues with and deterioration of the post-tensioning system; and failed to develop a professionally sound understanding of the Washington Bridge's post-tensioning system, structural elements, and unique design sufficient to identify for the State of Rhode Island the existence of conditions constituting an immediate threat to public safety.

As a direct and proximate result of Collins' failure to conduct a detailed research and review of the bridge structure file, its failure to conduct an inspection in accordance

with the inspection contract, its failure to perform evaluations and report to the State as required by the contract, and its failure to recommend evaluation of conditions constituting a threat to public safety as required by the contract, the State was not properly informed or advised of the work or repairs necessary to completely or adequately rehabilitate the Washington Bridge and the Washington Bridge was not completely or adequately rehabilitated. Collins' failure to perform adequate evaluations and report to the State as required directly and proximately caused the emergency closure of the Washington Bridge in December of 2023, the expenditure of money for repair and other work, the expenditure of money to demolish and replace the Washington Bridge, and physical wear and tear damage to the Eastbound Washington Bridge.

Pursuant to Rule 33(d), Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel, and previously produced Production 19 and 20 folder. Discovery is ongoing and investigation continues, and the State reserves the right to supplement this response accordingly.

6. Identify any extra-contractual duties Collins allegedly owed the State in connection with Collins Contract or Collins 2017 Inspection of the Washington Bridge, provide a detailed explanation of the basis for such alleged duties, describe in detail how Collins allegedly breached such duties, and identify all documents related to the existence of such alleged duties.

RESPONSE: Subject to and without waiving the General Objections, the State responds as follows:

Collins owed the State a duty to conform to the standard of skill, care, and diligence exercised by professional engineering, consulting, construction, inspection, and design firm in conducting the July 24, 2017 inspection of the Washington Bridge.

Collins breached its duty of care by, inter alia, negligently failing to (a) conduct a reasonably adequate detailed research and review of the bridge structure file for the Washington Bridge, including but not limited to, previous inspection reports, drawings, and plans; (b) conduct an inspection of the Washington Bridge in conformance with the standard of care customary in the professional engineering, consulting, construction, and design industry; (c) recognize the importance and significance of the tie-down rods as critical to the stability of the Washington Bridge; (d) perform an investigation into or evaluation of the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams; and (e) recommend repairs to address the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams.

The State contends that Collins also had duties imposed by law as a professional engineering company, which include:

- a. The duty to “perform their services only in the areas of their competence according to current standards of technical competence [.]” see Rules and Regulations for Professional Engineering in the State of Rhode Island, effective October 16, 2014 (the “2014 Professional Engineering Regulations”) at § 120.62.2.1; see *also* 430-RICR-00-00-1.7(B)(1);
- b. The duty to “recognize their responsibility to the public and . . . represent themselves before the public only in an objective and truthful manner,” see 2014 Professional Engineering Regulations at § 120.62.2.2; see *also* 430-RICR-00-00-1.7(B)(2);
- c. The duty to “in the performance of their services for clients, employers, and customers, . . . be cognizant that their first and foremost responsibility is to the public welfare,” see 2014 Professional Engineering Regulations at § 120.62.3.1; see *also* 430-RICR-00-00-1.7(C)(1);
- d. The duty to “undertake assignments only when qualified by education or experience in the specific technical fields of engineering involved,” see 2014 Professional Engineering Regulations at § 120.62.4.1; see *also* 430-RICR-00-00-1.7(D)(1);
- e. The duty to “not affix their signatures or seals to any drawings or documents dealing with subject matter in which they lack competence,” see 2014 Professional Engineering Regulations at § 120.62.4.2; see *also* 430-RICR-00-00-1.7(D)(2);
- f. The duty to “not misrepresent or exaggerate their degree of responsibility in prior assignments or the complexity of said assignments” or “misrepresent pertinent facts concerning . . . past accomplishments” incident to the solicitation of business,” see 2014 Professional Engineering Regulations at § 120.62.5.1; see *also* 430-RICR-00-00-1.7(E)(1);
- g. The obligation to “rebuild, repair, restore, and make good all losses, injuries, or damages to any portion of the work from any cause except those beyond the control of and without the fault or negligence of” Jacobs, see State of Rhode Island Procurement Regulations: Section 12 Rhode Island Department of Transportation Projects at § 12.104.14; and
- h. The obligation to be responsible for all damage or injury to public or private property resulting from any act, omission, neglect, or misconduct in, of either [Jacobs’] or its subcontractors’ manner or method of executing the work, or in consequence of the non-execution thereof,” see State of Rhode

**Island Procurement Regulations: Section 12 Rhode Island
Department of Transportation Projects at § 12.104.14.**

As a direct and proximate result of Collins' negligence, the State has suffered and will continue to suffer both physical damages to its property and economic damages well in excess of the amount necessary to satisfy the jurisdiction of this Court.

Pursuant to Rule 33(d), Please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel and BATES: RIDOT_000064595-RIDOT_000064614. Discovery is ongoing and investigation continues, and the State reserves the right to supplement this response accordingly.

7. Provide all facts and identify all documents supporting the Plaintiff's allegations in Paragraph 148 of the Amended Complaint that Collins breached its inspection contract by failing to:
- a. conduct a detailed research and review of the bridge structure file for the Washington Bridge, including but not limited to, previous inspection reports, drawings, and plans;
 - b. conduct an inspection of the Washington bridge in conformance with the inspection contract;
 - c. perform evaluations and report to the State as required by the contract;
 - d. recommend needed repairs in accordance with the requirements of the contract; and
 - e. otherwise comply with its contractual obligations.

RESPONSE: Subject to and without waiving the General Objections, see Responses to Interrogatory Nos. 3, 4, 5, and 6 above, which are incorporated herein by reference.

In addition, the State contends that Collins failed to comply with its obligations pursuant to the 2014 inspection contract by failing to recognize not only the existence of the tie-down rods, but also their significance to the stability, integrity, and safety of the structure; it failed to evaluate, investigate, or recommend an investigation into or evaluation of the cause of the cracks in the concrete webs that ran parallel to the post-tensioning ducts; it failed to evaluate, investigate, or recommend an investigation into the previous issues with and deterioration of the post-tensioning system, including the deterioration in the supports for the cantilever drop-in beam connections and voids in the grout; and it failed to develop a professionally sound understanding of the Washington Bridge's post-tensioning system, structural elements, and unique design sufficient to identify for the State conditions constituting an immediate threat to public safety.

Collins also failed to conduct competent and professional inspections of the Washington Bridge that identified, evaluated, and/or recommended the type of repairs necessary to completely rehabilitate the bridge and/or ensure its safety for the

motoring public. This included Collins' failure to (1) recognize not only the existence of the tie-down rods and their significance to the stability, integrity, and safety of the structure, but also the section loss of the tie-down rods at Pier 6 and Pier 7 and recommend a review or an evaluation of the condition of all the tie-down rods; and (2) perform or recommend an evaluation of the condition of the post-tensioning system, including, without limitation, the condition of the post-tensioned ducts in the cantilever beams.

Pursuant to Rule 33(d), ease see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel, and previously produced Production 19 & 20 folder. Discovery is ongoing and investigation continues, and the State reserves the right to supplement this response accordingly.

8. Provide all facts and identify all documents supporting the State's allegations in Paragraph 152 of the Amended Complaint that Collins breached its duty of care by failing to:
 - a. conduct a reasonably adequate detailed research and review of the bridge structure file for the Washington Bridge, including but not limited to, previous inspection reports, drawings, and plans;
 - b. conduct an inspection of the Washington Bridge in conformance with the standard of care customary in the professional engineering, consulting, construction, and design industry;
 - c. recognize the importance and significance of the tie-down rods as critical to the stability of the Washington Bridge;
 - d. perform an investigation into or evaluation of the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams;
 - e. recommend repairs to address the cracking discovered along the post-tensioned cables in the post-tensioned cantilever beams.

RESPONSE: Subject to and without waiving the General Objections, see Responses to Interrogatory Nos. 3, 4, 5, 6, and 7 above, which are incorporated herein by reference, and the accompanying Bates identifications.

The State contends that Collins was negligent in failing to conduct a proper, reasonably adequate, or professionally sound review of the bridge structure file for the Washington Bridge. That review should have included, among other things, a review of the Original Design Plans and the design plans and drawings for the 1996–1998 rehabilitation of the Washington Bridge under R.I. Contract No. 9603.

Through a proper, reasonably adequate, or professionally sound review of the bridge structure file for the Washington Bridge, Collins should have first discovered the previous issues with and deterioration of the post-tensioning system, including the deterioration in the supports for the cantilever drop-in beam connections and voids in the grout, and then recommended an investigation into, or an evaluation

of, the condition of the post-tensioning system sufficient to completely rehabilitate the Washington Bridge.

No other inspection firm identified the significance of the cracking, or the growth of the cracking, in the post-tensioned cantilever beams as indicative of signs of active distress on the system critical to the Washington Bridge's stability prior to December 2023.

Pursuant to Rule 33(d), please see Defendant Specific folder for Collins and the attached PDF titled "Collins," produced contemporaneously and also provided in Excel format via email to counsel, and previously produced Production 19 & 20 folder. Discovery is ongoing and investigation continues, and the State reserves the right to supplement this response accordingly.

9. Set forth all facts upon which you rely in alleging that Collins is liable in tort for damages claimed by the State in connection with the closure and/or demolition and reconstruction of the Washington Bridge.

RESPONSE: Subject to and without waiving the General Objections, see Responses to Interrogatory Nos. 3, 4, 5, 6, 7, and 8 above, which are incorporated herein by reference.

Collins owed the State a duty to conform to the standard of skill, care, and diligence exercised by the average professional engineering, consulting, construction, inspection, and design firm in conducting its 2017 inspection of the Washington Bridge. Collins breached its duty of care as set forth in the State's Responses to Interrogatory Nos. 6 and 8 above. As a direct and proximate result of Collins' negligence, the State has suffered and will continue to suffer both physical damages to its property and economic damages.

Collins' failure to perform adequate evaluations and report to the State as required directly and proximately caused the emergency closure of the Washington Bridge in December of 2023, the expenditure of money for repair and other work from the 2017 inspection forward, the expenditure of money to demolish and replace the Washington Bridge, and physical wear and tear damage to the Eastbound Washington Bridge.

10. Set forth all facts upon which you rely in alleging that Collins is liable in contract for damages claimed by the State in connection with the closure and/or demolition and reconstruction of the Washington Bridge.

RESPONSE: Subject to and without waiving the General Objections, the State responds as follows, see Responses to Interrogatory Nos. 3, 4, 5, and 7 above, which are incorporated herein by reference.

The State and Collins are parties to a 2014 inspection contract. Collins conducted an inspection of the Washington Bridge on July 24, 2017 under the 2014 inspection contract. Collins breached the inspection contract as set forth in the State's Responses to Interrogatory Nos. 5 and 7 above.

As a direct and proximate result of Collins' breaches of the inspection contract, the State has suffered and will continue to suffer both physical damages to its property and economic damages well in excess of the amount necessary to satisfy the jurisdiction of this Court.

Discovery is ongoing and investigation continues, and the State reserves the right to supplement this response accordingly.

11. Please identify all routine and special inspections of the Washington Bridge conducted between 2010 and 2023.

RESPONSE: The following inspections of the Washington Bridge were conducted between 2010 and 2023:

- (a) MBI conducted a routine inspection of the Washington Bridge on August 3, 2011;
- (b) AI Engineers, Inc. conducted a routine inspection of the Washington Bridge on August 2, 2013;
- (c) AECOM conducted an inspection of the Washington Bridge in April 2014 as part of its design-related evaluation under the 2014 AECOM Contract;
- (d) AECOM conducted a routine inspection of the Washington Bridge on July 28, 2015;
- (e) TranSystems conducted a special inspection of the Washington Bridge on various dates from June 27, 2016 through July 15, 2016;
- (f) Collins conducted a routine inspection of the Washington Bridge between June 19, 2017 and July 24, 2017;
- (g) AECOM conducted a special inspection of the Washington Bridge from October 10, 2017 to October 27, 2017;
- (h) MBI conducted a special inspection of the Washington Bridge over multiple days between June 25, 2018 and July 24, 2018;
- (i) AECOM conducted a routine and special inspection of the Washington Bridge on various dates from June 17, 2019 to July 24, 2019;

(j) AECOM conducted a special inspection of the Washington Bridge over multiple dates from June 29, 2020 to July 22, 2020;

(k) Jacobs Engineering conducted a routine, special, and underwater inspection of the Washington Bridge on July 23, 2021;

(l) TranSystems conducted a special inspection of the Washington Bridge over multiple days between July 7, 2022 and July 22, 2022;

(m) AECOM conducted a routine inspection of the Washington Bridge over multiple days between June 19, 2023 and July 21, 2023.

Pursuant to Rule 33(d), please see BATES: RIDOT_00000001–RIDOT_000049852; RIDOT_000049921–RIDOT_000050804; RIDOT_000299794–RIDOT_000301421.

12. Please state the type(s) of inspection(s) performed by Collins in 2017 of the Washington Bridge.

RESPONSE: Collins conducted a routine inspection of the Washington Bridge between June 19, 2017 and July 24, 2017.

13. Please state with specificity the differences between routine inspections and special inspections of the Washington Bridge.

RESPONSE: The Plaintiff objects to this Interrogatory to the extent it calls for expert opinion or legal conclusions. Subject to said objections and without waiving same, the State responds as follows:

All bridges subject to the National Bridge Inspection Standards (NBIS) are inspected per the FHWA Bridge Inspection Reference Manual (BIRM) and the RI Bridge Inspection Manual. Routine inspections of the Washington Bridge were conducted every two years. Additionally, because of the known deteriorating condition of the Washington Bridge, special inspections began in 2016. The inspections were intended to result in comprehensive evaluations and recommendations with respect to both the superstructure and substructure of the Washington Bridge. Special inspections were specifically intended to investigate the deteriorated condition of elements on the superstructure and substructure.

14. Identify each and every firm that performed inspections of the Washington Bridge in the 25 years before and in the years after the Inspection performed in 2017 by Collins and identify whether these inspections were special or routine.

RESPONSE: The Plaintiff objects to this Interrogatory to the extent that it is overly broad and unduly burdensome as it requests information spanning 25 years prior to Collins' 2017 inspection. Subject to said objections and without waiving same, please

see the State's Response to Interrogatory No. 11 above, which identifies all inspections between 2010 and 2023.

In addition, the Lichtenstein Report was prepared in connection with an inspection conducted in the early 1990s. Additional inspections were conducted in connection with the 1996–1998 rehabilitation project.

Pursuant to Rule 33(d), please see BATES: RIDOT_000000001–RIDOT_000049852; RIDOT_000299794–RIDOT_000301421. The State reserves the right to supplement this response.

15. Please state with specificity if there was any other inspection report in the Plaintiff's possession regarding the condition of the Washington Bridge's post-tensioned cantilever beams and post-tensioning system, before or at the time of Collins 2017 Inspection.

RESPONSE Yes. Previous inspection reports in the State's possession at the time of Collins' 2017 inspection discussed the condition of the post-tensioned cantilever beams and post-tensioning system, including: the Lichtenstein Report (January 1992); rehabilitation project records from the 1996–1998 rehabilitation; MBI's 2011 inspection report; AECOM's Final Technical Evaluation Report and Bridge Inspection Results, transmitted to RIDOT on or about January 21, 2015; TranSystems' 2016 special inspection report; and AECOM's 2015 routine inspection report.

Pursuant to Rule 33(d), please see BATES: RIDOT_000012781–RIDOT_000012822 (Lichtenstein Report); RIDOT_000022354–RIDOT_000022482 (1996–1998 rehabilitation records); RIDOT_000049921–RIDOT_000050804 (MBI 2011 inspection report); RIDOT_000044622; RIDOT_000063199–RIDOT_000063429 (AECOM Final Technical Evaluation Report); Productions 19 and 20 (inspection reports generally).

16. If the answer to the prior Interrogatory was answered in the affirmative, please identify the inspection report and state what the reported conditions were on the inspection report.

RESPONSE: The Plaintiff objects to this Interrogatory to the extent that it seeks interpretations of reports that clearly speak for themselves. Subject to and without waiving same and the General Objections, the State responds as follows:

The Lichtenstein Report (1992) noted that the grout in the stressing pocket and the precast shoulders of the cantilever beams were showing signs of distress, expressed concern about corrosion from moisture and salt exposure in the post-tensioning cables, noted the presence of voids in the grout suggested by radiography, and identified cracks in the beam webs that followed the tendon profile.

During the 1996–1998 rehabilitation, significant deterioration was discovered in the supports of the cantilever drop-in beam connections, as well as voids in the grout

encasing and protecting the cables in the post-tensioned cantilever beams. Retrofit grouting was performed.

AECOM's Final Technical Evaluation Report (January 2015) documented existing conditions of the post-tensioned cantilever beams, including the existence of cracking in the post-tensioned concrete beams, but AECOM failed to evaluate, investigate, or recommend further investigation into the cause of such cracking and its importance as a sign of active distress on the system.

Pursuant to Rule 33(d), please see BATES: RIDOT_000012781–RIDOT_000012822 (Lichtenstein Report); RIDOT_000022354–RIDOT_000022482 (1996–1998 rehabilitation records); RIDOT_000044622; RIDOT_000063199–RIDOT_000063429 (AECOM Final Technical Evaluation Report). Discovery is ongoing and the State reserves the right to supplement this response.

17. Please state with specificity if there was any other inspection report regarding the condition of the Washington Bridge's tie-down rods, before or at the time of Collins 2017 Inspection.

RESPONSE: Subject to and without waiving the General Objections, the State responds as follows:

The Original Design Plans for the Washington Bridge depicted the tie-down rods and their significance to the structural design of the bridge. The State contends, however, that no inspection firm prior to the emergency closure in December 2023 identified the existence, significance, or condition of the tie-down rods or recommended an evaluation of their condition.

18. Describe in full and complete detail the Plaintiff's inspection protocol for the Washington Bridge relative to its post-tensioned cantilever beams from the time the Washington Bridge opened to traffic until December 2023.

RESPONSE: The Plaintiff objects to this Interrogatory as overly broad and unduly burdensome as it spans a time period from 1968 to 2023. Subject to said objections and without waiving same, all bridges subject to the National Bridge Inspection Standards (NBIS) are inspected per the FHWA Bridge Inspection Reference Manual (BIRM) and the RI Bridge Inspection Manual. The scope of work for any bridge inspection is contained within these documents.

Routine inspections of the Washington Bridge were conducted every two years. Special inspections began in 2016 due to the known deteriorating condition of the Washington Bridge. The inspections were intended to result in comprehensive evaluations and recommendations with respect to both the superstructure and substructure of the Washington Bridge.

The State retained professional engineering firms to conduct bridge inspections and relied upon those firms to use their professional expertise and judgment to properly inspect and evaluate all structural elements of the Washington Bridge, including the post-tensioned cantilever beams, and to report their findings and recommendations to RIDOT.

19. If the answer to the prior Interrogatory was answered in the affirmative, please identify the inspection report and state what the reported conditions were on the inspection report.

RESPONSE: See Responses to Interrogatory Nos. 15, 16, and 18 above, which are incorporated herein by reference.

Pursuant to Rule 33(d), please see BATES: RIDOT_000000001–RIDOT_000447926.

20. Describe in full and complete detail the Plaintiff's inspection protocol for the Washington Bridge relative to its tie-down rods from the time the Washington Bridge opened to traffic until December 2023.

RESPONSE: The Plaintiff objects to this Interrogatory as overly broad and unduly burdensome. Subject to said objections and without waiving same, the State's inspection protocol for the Washington Bridge was governed by the NBIS, the FHWA Bridge Inspection Reference Manual, and the RI Bridge Inspection Manual. The State retained professional engineering firms to conduct bridge inspections and reasonably and justifiably relied upon those firms to use their professional expertise and judgment to properly inspect and evaluate all structural elements of the Washington Bridge, including the tie-down rods, and to report their findings and recommendations to RIDOT.

Only the exterior facing tie-down rods on the exterior beams were accessible for visual inspection. No inspection firm prior to the emergency closure in December 2023 identified the existence, significance or condition of the tie-down rods or recommended an evaluation of their condition.

Discovery is ongoing, and investigation continues, and the State reserves the right to supplement this response.

21. If the answer to the prior Interrogatory was answered in the affirmative, please identify the inspection report and state what the reported conditions were on the inspection report.

RESPONSE: See Response to Interrogatory No. 20 above. As set forth therein, no inspection firm prior to the emergency closure in December 2023 identified or reported on the condition of the tie-down rods.

22. Identify in detail all physical damage to its property and economic damages suffered by the Plaintiff as a proximate result of the alleged negligence or breach of contract by Collins.

RESPONSE: The Plaintiff objects to this Interrogatory to the extent that it seeks information that is protected by the attorney-client privilege or the work product doctrine, and the protections from disclosure afforded to non-testifying experts. The Plaintiff further objects to this Interrogatory as prematurely seeking disclosure of damages that will be quantified and qualified during the expert witness phase. Subject to said objections and without waiving same, the State responds as follows:

As a direct and proximate result of Collins' negligence and breach of contract, the State has suffered and will continue to suffer the following categories of damages: (a) the costs associated with the emergency closure of the Washington Bridge in December 2023; (b) the costs of the post-closure investigation, which totaled at least \$21,068,493.65, including Bridge Inspection (\$1,887,055.78), Emergency Contract 2024-CB-012 (\$19,027,822.60), and AECOM costs (\$153,615.27); (c) the costs to demolish and replace the Washington Bridge; and (d) physical wear and tear damage to the Eastbound Washington Bridge.

Since the closure of Washington Bridge 070001, the Department added a 6th lane of travel to the Eastbound Washington Bridge (Bridge 020001/Bridge 200) and now has 160,000 ADT (up from 90,000 ADT prior to the closure). Increased maintenance activities on Bridge 200 since the closure have included the replacement of 55 scupper grates, additional deck spall repairs due to the increased ADT, and 68 separate work orders from 12/11/2023 to the present.

All damages are subject to change, including but not limited to review by the State's experts. The State will quantify and qualify its precise damages during the appropriate expert witness phase. Discovery is ongoing and investigation continues, and the State reserves the right to supplement this response accordingly.

23. For each item of damage claimed by Plaintiff, provide an itemized list of the physical and economic damage claimed, along with the claimed monetary amount attributable to each item of damage.

RESPONSE: The Plaintiff objects to this Interrogatory to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine, and the protections from disclosure afforded to non-testifying experts. The Plaintiff further objects as this Interrogatory prematurely seeks expert witness disclosure. Subject to said objections and without waiving same, see Response to Interrogatory No. 22 above.

The State will quantify and qualify its precise damages during the appropriate expert witness phase. All costs are subject to change, including but not limited to review by the State's experts. Discovery is ongoing and the State reserves the right to supplement this response.

24. If Plaintiff alleges damages based upon the increased usage of the Eastbound Washington Bridge, state with specificity the claimed amount of increased traffic and associated costs and damages.

RESPONSE: The Plaintiff objects to this Interrogatory to the extent that it prematurely seeks expert witness disclosure. Subject to said objections and without waiving same, the State responds as follows:

Bridge 020001 (Bridge 200) was designed to handle 6 lanes of traffic; however, since its opening in 2008 and prior to the closure of Washington Bridge 070001 (Bridge 700), the Department was only utilizing 5 lanes of travel on Bridge 200 with traffic volume of 90,000 Average Daily Traffic (ADT). Since the closure of Bridge 700, the Department added a 6th lane of travel to Bridge 200 and now has 160,000 ADT, its full design capacity.

Increased maintenance activities on Bridge 200 since the closure of Bridge 700 have included the replacement of 55 scupper grates, additional deck spall repairs due to the increased ADT, and 68 separate work orders for Bridge 020001 from 12/11/2023 to the present.

All costs and damages associated with the increased usage of the Eastbound Washington Bridge are subject to quantification during the expert witness phase. The State reserves the right to supplement this response.

25. Describe in full and complete detail any and all Federal monies, funding or grants that the Plaintiff has received and/or expects to receive relative to the demolition and reconstruction of the Washington Bridge.

RESPONSE: The State has received or expects to receive the following Federal monies, funding, and/or grants relative to the demolition and reconstruction of the Bridge:

Demolition:

- Grant Anticipation Revenue Vehicles (“GARVEE”) Bond Proceeds, which are then matched by the following State Funds: (1) State Fiscal Recovery Funds (SFRF); and (2) Rhode Island Capital Plan Fund (RICAP). A Funding Table for the Demolition Project is depicted below:

Demolition Project Funding Table	
(in millions)	
GARVEE Bond Proceeds	\$78.26
SFRF Funds	\$19.27
RICAP Funds	\$0.30
Current Engineer's Estimate	\$97.83

The Reconstruction:

Based on estimates to date:

- **RIDOT was awarded two Discretionary Grants, which are intended to fund most of the 80% Federal share of the Reconstruction project. Those two grants were:**
 - **A Mega Grant (under the National Infrastructure Project Assistance Program) in the amount of \$125.4 million, which RIDOT was awarded on September 20, 2024; and**
 - **An INFRA Grant (under the Nationally Significant Multimodal Freight & Highway Projects Program) in the amount of \$95.6 million, which RIDOT was awarded on October 16, 2024.**
- **A 2019 “BUILD” Grant in the amount of \$15 million will be repurposed to fund another portion of the 80% Federal share.**
- **Federal Formula Bridge Funding in the approximate amount of \$4 million will be used to fund a portion of the 80% Federal share.**
- **GARVEE Bond proceeds will fund the remaining 80% of the Federal share that the grants do not cover.**

For its 20% match, the State will then use SFRF and RICAP funds. A Funding Table for the Reconstruction Project, based on the current engineer’s estimate, is depicted below:

Reconstruction Funding Table	
(in millions)	
2019 Build Grant	\$15.00
Mega Grant	\$125.40
INFRA grant	\$95.60
Federal Bridge Formula Funding	\$4.00
GARVEE Bond Proceeds	\$54.64
SFRF Funds	\$9.96
RICAP Funds	\$63.73
Current Engineer's Estimate	\$368.33

Discovery is ongoing. The Plaintiff reserves the right to supplement this answer accordingly.

26. Identify all individuals employed by the Plaintiff or RIDOT who were responsible for overseeing, supervising, reviewing, analyzing, evaluating or performing engineering reviews of the Washington Bridge from 2010 to December 2023.

RESPONSE: The Plaintiff objects to this Interrogatory as overly broad and unduly burdensome. Subject to said objections and without waiving same, no one at RIDOT was responsible for overseeing, supervising, reviewing, analyzing, evaluating, and performing engineering reviews for the Washington Bridge projects or inspections. The person responsible for the same was the consultant who stamped or oversaw and was in charge of the work.

27. Identify and describe in full detail all maintenance, cleaning, servicing, inspections and rehabilitation operations or other work performed on the Washington Bridge by the Plaintiff from 2010 through 2023 and the annual budget associated with such work.

RESPONSE: The Plaintiff objects to this Interrogatory as overly broad and unduly burdensome. Subject to said objections and without waiving same, individuals involved in overseeing bridge inspections at RIDOT during the relevant time period include, but are not limited to, David Cluley, P.E., Managing Engineer of the Bridge Inspection Unit within the Bridge Engineering Section at RIDOT.

Pursuant to Rule 33(d), please see BATES: RIDOT_000000001–RIDOT_000447926. The State is continuing to identify all responsive individuals and reserves the right to supplement this response.

28. Set forth all facts upon which you rely in claiming that the State is free from liability in connection with the closure and/or demolition and reconstruction of the Washington Bridge.

RESPONSE: Subject to and without waiving the General Objections, the State responds as follows:

The State contracted with professional engineering and inspection firms, including Collins, to inspect, evaluate, and make recommendations regarding the Washington Bridge. The State reasonably and justifiably relied upon the expertise and professional judgment of those firms, including Collins, to properly inspect and evaluate all structural elements of the Washington Bridge and to report their findings and recommendations to RIDOT.

Despite relying on these professional firms, none of the firms that conducted inspections adequately recognized or addressed critical elements of the bridge's structural safety and integrity. The State had the authority to direct additional testing or investigation, but relied upon the engineering firms, including Collins, to recommend whether additional testing or investigation was necessary with respect to the structural elements of the Washington Bridge.

29. Please state the names and address of all persons whom Plaintiff intends to call as an expert witness(es) at trial.

RESPONSE: The Plaintiff objects to this Interrogatory as premature. Expert witness disclosures will be made in accordance with the Court's scheduling order and the Rhode Island Superior Court Rules of Civil Procedure.

30. For each witness identified in response to the preceding Interrogatory, please state:

- a. The subject matter on which each expert is expected to testify;
- b. The substance of the facts and opinions to which each expert is expected to testify;
- c. A summary of the grounds for each opinion of each expert witness expected to testify; and
- d. A copy of any and all reports prepared by the expert(s).

RESPONSE: The Plaintiff objects to this Interrogatory as premature. See Response to Interrogatory No. 29 above. Expert witness disclosures will be made in accordance with the Court's scheduling order and the Rhode Island Superior Court Rules of Civil Procedure. The State reserves the right to supplement this response at the appropriate time.

31. If Plaintiff plans to call witnesses, other than those named in the answers to the preceding two Interrogatories, state:

- a. The name of the witness and his title, role or job description
- b. The substance of the facts to which the witness is expected to testify; and
- c. Whether the witness has given a statement and, if so, for each such statement, state:

- d. Whether written or recorded;
- e. Whether signed or unsigned;
- f. Its date; and
- g. The name and address of the present custodians at the time

RESPONSE: The Plaintiff objects to this Interrogatory as premature to the extent that it seeks information regarding witnesses the State intends to call at trial. The State has not yet finalized its witness list. Subject to said objections and without waiving same, the State anticipates calling fact witnesses who may include current and former RIDOT employees with knowledge of the inspections, maintenance, and condition of the Washington Bridge, as well as personnel from the various engineering firms involved with the Washington Bridge, including, but not limited to the following:

RESPONSE:

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Peter Alviti, Jr., P.E.	Rhode Island Department of Transportation ("RIDOT")	Former Director
Loren Doyle	RIDOT	Director of operations
Lori, Fisetta, MBA PMP	RIDOT	Director of Division of Project Management
Robert Rocchio, P.E.	RIDOT	Acting Director
John Preiss, P.E.	RIDOT	State Bridge Engineer
Keith Gaulin, P.E.	RIDOT	Deputy Chief Engineer
Mary Victoria Bertrand, P.E.	RIDOT	Managing Engineer
Anthony Pompei, P.E. PMP	RIDOT	Assistant Director for Administrative Services (Project Management)
David Cluley, P.E.	RIDOT	Managing Engineer. Worked on scope of work for 2014 AECOM project
Christopher Hart, P.E.	RIDOT	Managing Engineer. Day-to-day communications with consultants, scheduling, etc. After closure sent MBI to reinspect bridge
Gentry Andrews	RIDOT	Construction Manager
David Raposa	RIDOT	Resident Engineer
Craig Nazareth	RIDOT	Database Information Engineer

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Steven Soderlund, P.E. PMO	RIDOT	Assistant Manager, Project Management
Anthony Mako	RIDOT	Project Manager I
Lawrence Bailey, P.E.	RIDOT	Managing Engineer
Ryan Salvas	RIDOT	Project Manager 1 on Washington Bridge
Anthony Cimaglia, III	RIDOT	Construction Management
James Orr, P.E.	RIDOT (retired)	Managing Engineer
Dawn Cruz	RIDOT	Chief Financial Officer III
Kazem Farhoumand, P.E.	RIDOT (retired)	Chief Engineer
Matthew Quinan	RIDOT	Supervising Bridge Safety Inspector
George Ley, P.E.	RIDOT (retired)	Manager of Project Management
Kristen Capaldi	RIDOT (former employee)	Project manager 1 on Washington Bridge
Greg Polumbo	RIDOT (retired)	Project Manager 1 on Washington Bridge
Michael Swift	RIDOT (retired)	Resident engineer
Amanda Smith	RIDOT	Chief Document Management Specialist
Arthur Slader	RIDOT	Data Analyst I, Project Management, Materials-Section
Barry Simpson	RIDOT	Chief Program Development (ADA)
Brad Owens	RIDOT	
Brian Ferguson	RIDOT	Deputy Chief Engineer
Brian Smith	RIDOT	Administrator Financial Management
Charles St. Martin	RIDOT	Chief of Info Public Relations
Daniel Coffland	RIDOT	Project Management-Construction
Dave Fish	RIDOT (retired)	Former Administrator of Project Management
David Capalbo	RIDOT	Assistant Director For Administrative Services (Project Management)
Elena Sabella	RIDOT	Chief Implementation Aide
Elizabeth Cornell	RIDOT	Database Management System Specialist

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Everett Sammartino	RIDOT	Contracts and Specs Administrator
Gary Garzone	RIDOT	Contracts and Specs Administrator
Georgette Chahine	RIDOT (retired)	Managing Engineer
Jacob Begin	RIDOT	Interdepartmental Project Manager
James Capaldi	RIDOT	Supervising Contracts Specialist
James Gallant	RIDOT	Chief Civil Engineer (Construction & Maintenance)
James Isabella	RIDOT	Financial Management
James Pratt	RIDOT	Programming Services Officer
Jeanette Smith	RIDOT	Chief Implementation Aide
Jeffrey Ley	RIDOT	Chief Civil Engineer (Bridge Design)
Jeremy Abraham	RIDOT	Supervising Bridge Safety Inspector
Jessica DeGiovanni	RIDOT	Engineering Technician II
Jessica Rodas	RIDOT	Assistant Director for Administrative Services (Project Management)
Jim Primeau	RIDOT	Managing Engineer
Joseph Baker	RIDOT	Manager, Project Management
John Megrdochian	RIDOT	Assistant Director Financial & Contract Management
Jonathan Murray	RIDOT	Web Development Manager
Jose Lima	RIDOT	Manager, Materials and Quality Assurance
Joseph Lenk	RIDOT	Engineering Technician II (Construction Records)
Joshua Harrison	RIDOT	Principal Civil Engineer (Construction & Maintenance)
John-Paul Verducci	RIDOT	Associate Director, Division of Management Services
Justin McCoy	RIDOT	Principal Civil Engineer

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Kate Wilson	RIDOT	Principal Civil Engineer (Materials)
Keary Lebeau	RIDOT	Chief Civil Engineer (Bridge Design)
Ken Buteau	RIDOT (deceased)	
Kim McDougal	RIDOT	Contracts and Specs Assistant Administrator
Kimberly Beck	RIDOT	Chief Implementation Aide
Kristen Montecalvo	RIDOT	Programming Services Officer
Lisa Shevlin	RIDOT	Chief Implementation Aid
Lisbeth V. Pettengill	RIDOT	Communications Director
Louis Maccarone	RIDOT	Project Manager II (DOT)
Martin Bradburn	RIDOT	Bridge Safety Insp. + Rate DB Inf. Manager
Mary Sietins	RIDOT	Programming Services Officer
Megan E. Hall	RIDOT	Managing Engineer
Michael Byrne	RIDOT	Managing Engineer
Michael Caroppoli	RIDOT	Chief of Highway Maintenance Field Operations
Michael Sock	RIDOT	Principal Civil Engineer (Materials)
Nicole Leporacci	RIDOT	Senior Environmental Scientist
Paul Rizzo	RIDOT	Assistant Construction Engineer
Paul Schofield	RIDOT	Project Manager II
Peter Desimone	RIDOT	Assistant Director for Administrative Services (Project Management)
Robert Battista	RIDOT (retired)	Construction Management Resident
Robert Soscia	RIDOT	Manager, Materials and Quality Assurance
Sam Guglielmi	RIDOT	Senior Information And Public Relations Specialist
Samuel Hawkes	RIDOT	Managing Engineering
Sean Raymond	RIDOT	Assistant Director for Administrative Services (traffic)
Solight Sou	RIDOT	Chief Program

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
		Development (OCR)
Stephen Ricci, Sr.	RIDOT (former employee)	Area Engineer
Tracy Lane	RIDOT	Assistant Director Financial and Contract Management
Vince Rose	RIDOT	Supervising Bridge Safety Inspector
Vincent Palumbo	RIDOT	Manager, NEPA Cultural Resources, Utilities & Survey(
Denise Robinson	RIDOT	Engineering Technician IV (Construction Records)
Heidi Gudmunson	RIDOT	PROGRAMMING SERVICES OFFICER (Communications)
Director Marc Pappas	Rhode Island Emergency Management Agency (RIEMA)	
Colonel Darnell Weaver	Rhode Island State Police (RISP)	
Chief Sid Wordell	Rhode Island Police Chiefs Association	
All persons with knowledge regarding AECOM's involvement with the Washington Bridge Project(s)	AECOM	
Corey Richard	AECOM	Project Manager
Robert Wright	AECOM	Professional Engineer
Jeffrey Sam	AECOM	Team Leader/ Inspector
Matt Sprague	AECOM	Team Member
Richard Prior	AECOM	QA/QC Lead
Dennis Flynn	AECOM	Assisted with Traffic
Jeff Maxtutis	AECOM	Assisted with Traffic
Mark Gardella	AECOM	Environmental
Al Pratt	AECOM	Environmental
Caleigh Duffy	AECOM	Staff Inspector
Minh Pham	AECOM	Staff Inspector
Mike Allsop	AECOM	Staff Inspector

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
All persons with knowledge regarding Michael Baker International Inc.'s involvement with the Washington Bridge Project(s)		
Marc D'Amore	Michael Baker International, Inc.	
Paul McGuinness	Michael Baker International, Inc.	
Benjamin Tavares	Michael Baker International, Inc.	Inspector
Kirsten Bequette	Michael Baker International, Inc.	
Juan Carlos Rodriguez	Michael Baker International, Inc.	Staff Inspector
E. Raymond Whitbread	Michael Baker International, Inc.	On Call Inspection Services
All persons with knowledge regarding Vanasse Hangen Brustlin, Inc.'s involvement with the Washington Bridge Project(s)		
Jeffrey Klein	Vanasse Hangen Brustlin, Inc.	
Thomas Jackmin	Vanasse Hangen Brustlin, Inc.	
Andrew Prizzioso	Vanasse Hangen Brustlin, Inc.s	Engineer
Michael Murdock	VN Engineers, Inc-Subcontractor	Engineer
All persons with knowledge regarding Barletta Heavy Division Inc.'s involvement with the Washington Bridge Project(s)		
Kyle Ferreira	Barletta Heavy	

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
	Division	
Vincent F. Barletta	Barletta Heavy Division	
All persons with knowledge regarding Barletta/Aetna I-195 Washington Bridge North Phase 2V's involvement with the Washington Bridge Project(s)		
Kyle Ferreira	Barletta Heavy Division	
Jeff Bostock	Aetna Bridge Company	
Michael Foley	Barletta/Aetna I-195 Washington Bridge North Phase 2V	Executed Contract 2021-DB-020 on behalf of JV
Vincent F. Barletta	Barletta Heavy Division	Executed JV Agreement
Hugo R. Mainelli, III	Aetna Bridge Company	Executed JV Agreement
All persons with knowledge regarding Aetna Bridge Company's involvement with the Washington Bridge Project(s)		
Jeff Bostock	Aetna Bridge Company	
Hugo R. Mainelli, III	Aetna Bridge Company	
All persons with knowledge regarding Aries Support Services, Inc.'s involvement with the Washington Bridge Project(s)		
Pamela Olsen	Aries Support Services, Inc.	President of Aries

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
All persons with knowledge regarding Collins Engineers, Inc.'s involvement with the Washington Bridge Project(s)		
Robert Snelgrove	Collins Engineers, Inc.	Inspector
Seth Lemoine	Collins Engineers, Inc.	Inspector
James Karalekas Jr.	Collins Engineers, Inc.	Inspector
Matthew Liguore	Collins Engineers, Inc.	Inspector
Curtis Cheney	Collins Engineers, Inc.	Inspector
Juan Quintero	Collins Engineers, Inc.	Inspector
Daniel Cecchi	Collins Engineers, Inc.	Executed the RFP Proposal for on call Bridge Inspections on behalf of Collins Engineering in 2013.
All persons with knowledge regarding Commonwealth Engineers & Consultants, Inc.'s involvement with the Washington Bridge Project(s)		
Benjamin Soares	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
Matthew Brooks	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
Niverio Carvalho	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
Fernando Faria	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
Celita Vargas	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
James Onysko	Commonwealth Engineers & Consultants, Inc.	Assisted in the July 2023 Bridge Inspection
All persons with knowledge regarding Jacobs Engineering Group, Inc.'s involvement with the Washington Bridge Project(s)		
Anthony Richardson	Jacobs Engineering Group, Inc.	Executed and stamped September 20, 2021 cover letter with inspection reports on behalf of Jacobs Engineering.
Chris Henquinet	Jacobs Engineering Group, Inc.	Inspector
Vanessa Buonomano	Jacobs Engineering Group, Inc.	Inspector
Brendan Herridge	Jacobs Engineering Group, Inc.	Inspector
Cassandra Kelly	Jacobs Engineering Group, Inc.	Staff Inspector
Tianqi Qu	Jacobs Engineering Group, Inc.	Inspector
All persons with knowledge regarding Prime AE Group, Inc.'s involvement with the Washington Bridge Project(s)		
Hugh Neenan	Prime AE Group	Executed and submitted subcontractor proposal letter to AECOM for the 2014 Rehabilitation

NAME	RELATIONSHIP TO CASE	KNOWLEDGE
		Project and signed the Construction Plan on behalf of Prime AE group as registered Professional Engineer on September 23, 2016.
Navit Nakrani	Prime AE Group	Rehab/Analysis
All persons with knowledge regarding Steere Engineering, Inc.'s involvement with the Washington Bridge Project(s)		
Jonathan Azevedo	Steere Engineering, Inc.	Professional Engineer
Patricia Steere	Steere Engineering, Inc.	Executed and submitted subcontractor proposal letter to AECOM for the 2014 Rehabilitation Project.
All persons with knowledge regarding TranSystems Corporation's involvement with the Washington Bridge Project(s)		
Kevin Isu	TranSystems	Inspector
John Corbo	TranSystems	Team Member
Paul Nagle	TranSystems	Inspector
Victoria Sampson	TranSystems	
Corey St. Sauveur	TranSystems	
Erica Mansur	TranSystems	
Sky Lucero-Keniston	TranSystems	Staff Inspector

The State reserves the right to supplement this response at the appropriate time.

32. Please state the names and address of all persons whom Plaintiff intends to call as a fact witness at trial who intends to testify with regard to any inspections, remedial work or damages.

RESPONSE: The Plaintiff objects to this Interrogatory as premature to the extent that it seeks information regarding witnesses the State intends to call at trial. Subject to

said objections and without waiving same, the State has not yet finalized its witness list and anticipates calling fact witnesses who may include current and former RIDOT employees with knowledge of the inspections, maintenance, condition, and damages related to the Washington Bridge, as well as personnel from the various engineering firms involved with the Washington Bridge. See the above answer to interrogatory 31. The State reserves the right to supplement this response at the appropriate time.

I, Loren Doyle, under the pains and penalty of perjury, declare that the foregoing is true based upon matters within my personal knowledge and information that has been assembled and provided to me and that the answers provided are correct, according to the best of my knowledge.

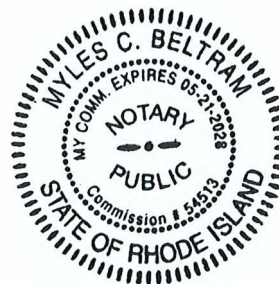
Loren Doyle
By: Loren Doyle

Dated: 4/10/26

STATE OF RHODE ISLAND
COUNTY OF PROVIDENCE

On this 10th day of April, 2026, before me, the undersigned notary, personally appeared Loren Doyle personally known to the notary, to be the person who signed above in my presence, and who swore or affirmed to the notary that the contents of the document are truthful to the best of his knowledge.

Myles C. Beltram
NOTARY PUBLIC
My commission expires: 5/31/2028
Notary identification number: 24513



As to Objections,
Plaintiff,
State of Rhode Island,
By its Attorneys,

/s/ Sarah W. Rice

Sarah W. Rice, Esq. (#10588)
Assistant Attorney General
Megan Rok, Esq. (#11098)¹
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Rhode Island Office of the Attorney General
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/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*)
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/s/ Jonathan N. Savage

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

CERTIFICATE OF SERVICE

I hereby certify that on the 10th 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