

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.,)
TRANSYSSTEMS CORPORATION, and)
VANASSE HANGEN BRUSTLIN, INC.,)
)
Defendants.)

C.A. No. PC-2024-04526

JOINT STATUS REPORT

Now come the Plaintiff and the Defendants (together, the “Parties”), by and through their respective counsel, and in connection with the Court’s instruction to the Parties at the April 15, 2026 conference, hereby submit this Joint Status Report on the status of discovery.

I. The Plaintiff’s Update on Discovery.

The Plaintiff (the “State”) has served, among other written discovery, interrogatories and document requests to Defendant AECOM Technical Services, Inc. (“AECOM”) and Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV (the “JV”). The State has notified both AECOM and the JV of its position as to the sufficiency of their responses and AECOM and the JV have communicated, in writing, their respective responses. The State intends to meet and

confer on these issues and is optimistic that the Court's recent Decision will serve as a helpful guidepost as to AECOM and the JV's respective obligations to provide direct and complete responses. If, however, that process results in an impasse, the dispute will result in motion practice.

II. The Defendants' Update on Discovery.

On behalf of AECOM:

Deficiencies in the State's Answers to Interrogatories. The State and AECOM remain at an impasse concerning the State's Answers to AECOM's First Set of Interrogatories, as previously detailed in the Parties' February 27, 2026 Joint Status Report. Accordingly and unfortunately, AECOM intends to file a motion to compel regarding the State's Answers to AECOM's First Set of Interrogatories.

Ongoing Issues with ESI Search Parameters for the Parties' Respective Email Collections. The State and AECOM also remain at an impasse concerning ESI search parameters for the parties' respective email collections. AECOM served a detailed proposal on January 6, 2026, addressing custodians, date ranges, and search terms for both AECOM's and the State's respective email ESI, and the parties have since exchanged multiple letters and participated in several meet-and-confer conferences.

With respect to AECOM's email ESI collection, AECOM has proposed custodians and date ranges grounded in time-charge data and documented project involvement for each individual custodian. The State seeks uniform start and end dates (March 2013 through August 2024) for all custodians irrespective of when they were actually involved with the bridge, as well as additional irrelevant custodians, which AECOM contends are disproportionate and untethered to the issues in dispute or to each custodian's involvement with the Bridge. The State has declined to

meaningfully engage with or account for the time-charge data underlying AECOM's proposal, and the parties therefore remain at impasse regarding custodians and date ranges.

The parties also remain at impasse regarding the scope and form of the State's proposed email ESI search terms, which the State belatedly provided on April 24, 2026 despite months of requests from AECOM. AECOM maintains that the State's proposed terms are overbroad and not presented in a workable format. To be more specific, AECOM received the attached proposal from the State dated April 24, 2026, which is incomprehensible, lacks specificity and includes terms that are not tailored to the issues in dispute in this litigation, would hit on every bridge project in which AECOM is involved and would result in searches producing hundreds of thousands, if not millions, of "non-responsive" documents. AECOM's response is also attached.

With respect to the State's email ESI collection, the parties have resolved certain issues; however, the parties remain at impasse regarding the State's proposed end date and the State's refusal to collect and produce email for several State custodians that AECOM contends are relevant and proportional based on their roles, responsibilities, and involvement with the Washington Bridge Projects. In particular, the State seeks to cut off its email collection in April 2024 (while insisting that AECOM's collection extend through August 2024), notwithstanding the State's allegations of ongoing damages that include the cost of demolition, replacement, and evaluation/monitoring activities related to the Washington Bridge that extend beyond the State's proposed cutoff date to present.

Despite continued discussions, these issues remain unresolved. Given that AECOM first served its ESI proposals more than three (3) months ago on January 6, 2026, and the parties have been unable to reach closure through several meet-and-confer efforts, AECOM respectfully submits that Court involvement (*i.e.*, through a conference or hearing) would be the most efficient

way to resolve the remaining email ESI production issues and prevent further delay, without having to resort to formal motion practice.

AECOM's Response to the State's Deficiency Letter. On March 4, 2026—over four (4) months after AECOM served its written discovery responses in October 2025—the State served a deficiency letter asserting alleged deficiencies in AECOM's discovery responses. AECOM responded in detail by letter dated March 18, 2026, explaining why the State's assertions were unfounded, addressing each of the State's purported deficiencies, and confirming that AECOM's discovery responses comply with the Rhode Island Superior Court Rules of Civil Procedure. Since serving its response, AECOM has not received a reply from the State, nor has the State requested a meet-and-confer or proposed any process to narrow or resolve the issues raised. Accordingly, AECOM assumes that the State is satisfied with AECOM's response.

On behalf of the JV:

Ongoing Issues with the State's Production. The status of the State's custodian production remains unknown. At the April 15 Status Conference, the State represented that its custodian email production in response to the JV's RFPs would be complete in approximately ten days, and the Court requested a discovery status update in that context. Since April 15, the State made a supplemental production of 48 documents on April 30, 2026, the completeness and sufficiency of which are still being evaluated, but it has not otherwise provided an update on the status of its production.

Deficiencies the JV Has Raised with the State. On April 23, 2026, the JV sent the State a deficiency letter identifying deficiencies in the State's April 7, 2026 responses to the JV's Fourth Set of RFPs and Third Set of Interrogatories. Among other issues, the State has categorically refused to produce documents regarding other bridge structures in its inventory relating to

inspection, maintenance, and structural deficiencies — matters directly relevant to the claims and defenses in this case. The JV has requested that the State provide complete supplemental responses no later than May 8, 2026, or meet and confer no later than May 4, 2026, to address these deficiencies. As of the date of this filing, the State has not responded. If the State does not provide timely and adequate supplementation or otherwise address these deficiencies, additional motion practice may be needed.

The JV's Response to the State's Deficiency Letter. The State waited nearly five months after the JV served its discovery responses on October 28, 2025, before raising any issue by letter dated March 17, 2026. Upon receipt of the State's letter, the JV promptly proposed specific conferral dates and times; the State did not respond until more than a week later, after the proposed conferral window had passed, and offered new dates. The JV agreed the same day to the State's proposed date and time. The JV then responded in detail by letter dated April 6, 2026, addressing the State's purported deficiencies and setting forth its positions. The State responded on April 8. Its letter largely restated its original March 17 position without meaningfully engaging with the JV's positions, and then cancelled the parties' scheduled meet and confer without proposing a new date. The JV followed up again by letter dated April 15, 2026, which walked the State through its production methodology, including date ranges, custodian identification, and the search terms applied. The JV's April 6 and April 15 letters remain unanswered in substance, and the State has not meaningfully attempted to confer with the JV regarding the issues raised therein.

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of May, 2026, I electronically filed and served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Allison Y. Charette

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April 24, 2026

Sent via E-Mail

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Re: State of Rhode Island v. AECOM Technical Services, Inc., et al., C.A. No. PC-2024-04526

State's Proposed Search Terms for AECOM Custodian Collections

Counsel, please see below the State's proposed search terms for AECOM custodian collections:

"Washington Bridge" - "Wash Bridge" - "WB" - "I-195 WB" - "Bridge" /700 - "Structure" /700 - "070001" - "2016-CB-059" - "Contract 2014-EB-003" - "AECOM" /"Washington Bridge" "Tie-down rods" - "Tie down rods" - "Tie rods" - "Tension rods" - "PT rods" - "Post tension" - "Post-tensioned cantilever beams" - "Post-tensioned steel cables" - "Tendon ducts" - "Vertical rods" - "Anchor rods" - "Anchorage" - "Anchor plate" - "Cantilever" - "Unbalanced cantilever" - "Drop-in beam" - "Drop-in prestressed girder spans" - "Prestress" - "Link slab" - "Corbels" - "Pedestals" - "West Abutment" - "Plastic hinge" "Pier 6" - "Pier 7" - "Piers 6 & 7" - "Span 6" - "Span 7" - "Spans 6 & 7" - "PT rod" /"pier" - "PT rod" /"span" - "Tie-down rods" /"pier" - "Tie-down rods" /"span" - "Tension rods" /"pier" - "Tension rods" /"span" - "Necking" /"pier" - "Necking" /"span" - "Catastrophic" /"pier" - "Catastrophic" /"span" - "Failure" /"pier" - "Failure" /"span" - "Critical" /"pier" - "Critical" /"span" - "Replace" /"pier" - "Replace" /"span" - "Replace" /"Washington Bridge" Pier* w/3 (1 OR 2 OR 3 OR 4 OR 5 OR 6 OR 7 OR "Abutment 1") "Poor" - "Poor condition" - "Deterioration" - "Concrete" /3 "deterioration" - "Substantial concrete deterioration" - "Deterioration" /"pier" - "Deterioration" /"span" - "Deterioration" /10 "concrete drop-in beams" - "Deterioration" /3 "concrete" - "Corrosion" - "Corrosion" /"post-tensioned cantilever beams" - "Corrosion" /"post-tensioning cables" - "Diagonal cracks" - "Diagonal cracks" /"post-tensioned beams" - "Cracking" - "Web cracks" - "Distress" - "Distress" /10 "cantilever beams" - "Unsound concrete" - "Spall" - "Section

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loss" - "Freeze-thaw" - "Joint leakage" - "Water infiltration" - "Voids" - "Void" /3 "grout" -
"Voids in grout" /"post-tensioned cables" - "Grout" - "Necking" - "Fracture" - "Fracture-
critical" - "Defect" - "Deficient" - "Deficiencies" - "Deficient" /"pier" - "Deficient" /"span" -
"Deficiency" /"Michael Baker" - "Deficiency" /"MBI"
"breach of contract" OR "breached the contract"
"breach of fiduciary duty" OR "fiduciary duty"
"indemnity OR indemnification OR "contractual indemnity"
"differing site condition*" OR DSC
misrepresentation OR "material misrepresentation"
"good faith and fair dealing" OR "implied covenant"
"superior knowledge" w/10 (disclosure OR conceal* OR fail*)
contribution OR "right to contribution"

"Inspect" - "Inspection" - "Inspection" /3 "routine" - "Inspection" /3 "special" - "Bridge
diagnostics" - "Condition state" - "CS1" - "CS2" - "CS3" - "CS4" - "Assessment" -
"Analysis" - "Evaluation" - "Evaluation" /"substructure" - "Evaluation" /"superstructure" -
"Evaluation" /"beam end" - "Evaluation" /"drop-in girder" - "Technical Evaluation Report"
- "Technical evaluation" - "Destructive test" - "Non-destructive test" - "NDE" - "NDT" -
"MIRA scan" - "GPR" - "Ground penetrating radar" - "Load Rating" - "LRFR" - "HL-93" -
"Strength I" - "Load path redundancy" - "NBIS" - "AASHTO" - "BrM" - "Pontis" -
"Sampling" - "Test" - "Critical finding" - "Findings" - "Known condition" - "Known issues" -
"Known problems" - "Open items" - "Should have known" - "Report" - "Reports"
"Design" - "Design-bid-build" - "Design-bid" - "Design build" - "Design-build" - "Bid build"
- "Base technical concept" - "BTC" - "Construction plans" - "AECOM" /"construction
plans" /2 "2016" - "25-year design life" - "25-year life span" - "Final design" - "Camber
designs" - "Steel and camber designs" - "Scope of work" - "Scope not complete" -
"Incomplete work" - "Unfinished work" - "Remaining work" - "Joint elimination" -
"Superstructure drop-in spans and cantilevers" - "Eliminate" /2 "tiedown rod" -
"Reinforce" - "Strengthen" - "Maintain" - "Maintenance" - "Cure"
"Rehab" - "Rehabilitation" - "Rehabilitation" /3 "consultants" - "Rehabilitation" /3 "costs" -
"Costs" /3 "rehab" - "Consultants" /3 "completely rehab" - "Rehabilitation" /"bridge" -
"October 19, 2023" /2 "rehabilitation plans" - "Repair" - "Concrete" /3 "repair" - "AECOM"
/"concrete" /2 "repairs" - "Retrofit" - "Retrofit grouting" -
"Contract" /"RIDOT"/"DOT"/"Department of Transportation" - "Contract" /"RIDOT"
/"cancel" - "Contract" /"RIDOT" /"terminate" - "Terminate" - "Termination" - "Default" -
"Stop work" - "Letter of Interest" /"June 2014" - "Proposal for consideration" - "Request
for Information" - "RFI" - "Request for Proposal" - "RFP" - "July 23" /"contract" /"RIDOT"
- "July 2, 2021" /2 "design build proposal" - "September 1, 2021" /2 "purchase order" -
"Notice" /"change of contract" /"2019" - "Subcontractor" /2 "AECOM" - "Joint venture" -
"Joint venture plans" - "Consultant" - "Construction phase services" - "Federal Highway
Administration" - "FHWA" - "Department of Administration" - "DOA" - "RIDOA" -
"AECOM" /10 "plan" - "AECOM" /10 "recommend" - "Conclusions" - "Components" -
"Fee Proposal"

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AECOM OR "AECOM Technical Services"
VHB OR "Vanasse Hangen Brustlin"
"Commonwealth Engineers" OR "Commonwealth Engineers & Consultants"
Collins OR "Collins Engineers"
Jacobs OR "Jacobs Engineering"
TranSystems OR Transystems
"Michael Baker" OR MBI OR "Michael Baker International"
Steere OR "Steere Engineering"
"Prime AE" OR "Prime AE Group"
Aries OR "Aries Support Services"
Lichtenstein OR "A.G. Lichtenstein" OR "Lichtenstein Report"
Cardi OR "Cardi Corporation"
"Barletta/Aetna" OR "Barletta-Aetna" OR "Barletta Aetna"
"I-195 Washington Bridge North Phase 2 JV"
"AI Engineers" - "AIE" - "VN Engineers" - "VNE" - "Michael Baker" - "MBI" - "MBJ" -
"BDI" "Structural engineering" - "Structural" /3 "safety" - "Structural" /5 "security" -
"Structural safety" "Traffic" /2 "delays" - "Congestion" /2 "delays"

From: [Filbin, Michael](#)
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Subject: RE: State of Rhode Island v. AECOM Technical Services, Inc., et. al. -- State/AECOM ESI Collection
Date: Monday, April 27, 2026 10:46:10 AM
Attachments: [image001.png](#)

Takisha:

We have reviewed the State's proposed search terms for AECOM's email collection. As presented, they are not usable. It is impossible to discern what the State intends AECOM to run as actual search strings.

Please resend the proposal with individually numbered, complete search strings with parentheses and operators (AND / OR / proximity) clearly specified for each.

In addition, the State's proposal includes search terms that are facially overbroad and untethered to the Washington Bridge issues. By way of example, terms such as "contribution OR right to contribution," "Fee Proposal," and "breach of contract" are not project-specific and will inevitably hit emails relating to unrelated projects. Most notably, the proposed search term "AECOM OR 'AECOM Technical Services'" would, as written, sweep in every email in an AECOM custodians' mailboxes.

Accordingly, by close of business April 28, 2026, AECOM requests that the State:

1. Remove or materially narrow overbroad search terms that are not tailored to the Washington Bridge dispute; and
2. Resend the search terms as individually numbered, complete, runnable search strings with clearly defined operators/connectors.

AECOM is prepared to evaluate reasonable, targeted terms once the State provides a workable and appropriately constrained proposal.

Thank you,
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