

Folder	Zip Password	Link
FTP Password	CONaHj0P1nLg=S	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
AECOM Tech	.jMcQg*8jV?)FI1	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
AETNA Bridge	Jj_fxN9Xm~@4+4p	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Aries Support	hcxR^z!iv@if31W	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Barletta Heavy	paLMHK3BkzP>uft	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
BarlettaAETNA	Wuhi1Bh]>Z8HYb^	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Cardi Corp	JrwU=zeUgKB,fp7	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Collins Engineers	xp7@3clz1xRFP:@	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Commonwealth	nDFEb)JVCjA4W2y	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Jacobs Engineer	D19H~,t8mmQd+1%	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Michael Baker	JV4Y8ZUYHij*Jjn	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Prime AE]2LH-jo5A7uLWZe	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Steere Eng	~!E@~^G^4Y%Lx?)	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
Transystems	>B6g*o2]>@5NfCb	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports
VHB	qdknre4w=FoQ+ha	https://ftp.dauntlessdiscovery.com/public/folder/dohk-wmh9uyhapkqk2ms4a/14 Defendant Specific Exports

LINK HAS EXPIRED

BATES RIDOT_000000001- RIDOT_000014962	u85Tf2wT	https://ftp.dauntlessdiscovery.com/public/file/4_nwjferhkx28jvomqk8q/RIDOT_PROD001.zip
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BATES RIDOT_000049738 - RIDOT_000049852	nZ+@p8NfuLPqYK	https://ftp.dauntlessdiscovery.com/public/file/cuptknfpq0a77gclcvtn4g/RIDOT_PROD004_ Revised.zip
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BATES RIDOT_000050807 - RIDOT_000062592	hJymO7^%b5vGN	https://ftp.dauntlessdiscovery.com/public/file/sxissynkqkwesuedecgng/RIDOT_PROD006.zip
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RIDOT_PROD003_Unredacted:	683k95Ge	https://ftp.dauntlessdiscovery.com/public/file/fakkn6o04kc1dub-wvo_0q/RIDOT_PROD003_Unredacted.zip
Zip File	H29iG26x	LINK HAS EXPIRED
RIDOT_PROD005_Unredacted:	683k95Gd	https://ftp.dauntlessdiscovery.com/public/file/ktryuaorvkpvmvribfs1na/RIDOT_PROD005_Unredacted.zip
Zip File	H29iG26w	LINK HAS EXPIRED
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Zip File	F9Ve)DX8f>8]W%	LINK HAS EXPIRED
RIDOT_000065257 - RIDOT_000118538	6Prsy25q	https://ftp.dauntlessdiscovery.com/public/file/nft6fvlhwkiquxs1jdyiq/RIDOT_PROD010.zip
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RIDOT_PROD001_Unredacted	674tGsV2	https://ftp.dauntlessdiscovery.com/public/file/8154cisvyeusdbarzkej5g/RIDOT_PROD001_a.zip
Zip File	Y5943Ecw	LINK WILL EXPIRE IN 90 DAYS 4/6
RIDOT_PROD003_Unredacted	674tGsV3	https://ftp.dauntlessdiscovery.com/public/file/npmh7ogpjecqcd8gjdkfw/RIDOT_PROD003_a.zip
Zip File	Y5943Ecx	LINK WILL EXPIRE IN 90 DAYS 4/6
BATES RIDOT_000118539-RIDOT_000134217	\$JD6&+\$EuvlVFd	https://ftp.dauntlessdiscovery.com/public/file/hdth9dmykuae6uaqebczga/RIDOT_PROD011.zip
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BATES RIDOT_000134218 - RIDOT_000134482	pK38gV1x	https://ftp.dauntlessdiscovery.com/public/file/mrarubk5luy3re_6_jepsq/RIDOT_PROD012.zip
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RIDOT_PROD001_Unredacted02:	Uc39piB2	https://ftp.dauntlessdiscovery.com/public/file/s4cbqljcuaiqxotxgljow/RIDOT_PROD001_Unredacted02.zip
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RIDOT_PROD003_Unredacted02:	Uc39piB3	https://ftp.dauntlessdiscovery.com/public/file/u2dygouwi0stuf23ojb1ka/RIDOT_PROD003_Unredacted02.zip
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BATES RIDOT_000134483-RIDOT_000214339	pK38gV1z	https://ftp.dauntlessdiscovery.com/public/file/tuqxvsqcuuqmqmaz_47olw/RIDOT_PROD013.zip
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BATES RIDOT_000214340 - RIDOT_000225226	4S=vcz-gvw6h!R	https://ftp.dauntlessdiscovery.com/public/file/3fvdcpovy02epfl-wysaaw/RIDOT_PROD014.zip
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BATES RIDOT_000225227 - RIDOT_000228498	729i6Bc2	https://ftp.dauntlessdiscovery.com/public/file/9rgf5ruoieess3zziqscnzq/RIDOT_PROD015.zip
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BATES RIDOT_000228499 - RIDOT_000242007	+sE-a0w8YacR3V	https://ftp.dauntlessdiscovery.com/public/file/axgn6lw490a5cddc4dftfg/RIDOT_PROD016.zip
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BATES RIDOT_000242008 - RIDOT_000295177	8265gV39	https://ftp.dauntlessdiscovery.com/public/file/oroxzyna7kii_ty6xvksmw/RIDOT_PROD017.zip
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BATES RIDOT_000295178 - RIDOT_000299793	P7F=WBvu!XH^G-	https://ftp.dauntlessdiscovery.com/public/file/4pyerbx-y0mg81fkydmaa/RIDOT_PROD018.zip
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BATES RIDOT_000299794-RIDOT_000304128	298Nb37d	https://ftp.dauntlessdiscovery.com/public/file/adv58_vjkeore0p7mzv2a/RIDOT_PROD019.zip
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BATES RIDOT_000427123-RIDOT_000447724	3^b1-8aSUjry5C	https://ftp.dauntlessdiscovery.com/public/file/_lSr84rcieuyxi9qmaieyq/RIDOT_PROD022.zip
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BATES RIDOT_000447927 - RIDOT_000676185	49iVc2jd	https://ftp.dauntlessdiscovery.com/public/file/c6rt30ip8euj9urpyv8n3a/RIDOT_PROD023.zip
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BATES RIDOT_000676186 RIDOT_000676490	M59iB3fc	https://ftp.dauntlessdiscovery.com/public/file/gsbj5mfvs0shc9er_gbesg/RIDOT_PROD024.zip
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BATES RIDOT_000676491 - RIDOT_000676538	#7kD1mlrOI!tB#	https://ftp.dauntlessdiscovery.com/public/file/cnbs-9mese6ekcao4pkang/RIDOT_PROD025.zip
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BATES RIDOT_000676539 - RIDOT_000676584	btNu+4kkaRqR+q	https://ftp.dauntlessdiscovery.com/public/file/5dz2oppoe0wgnliprukgia/RIDOT_PROD026.zip
Zip File	uA^>e%^H0jNCXpY	LINK WILL EXPIRE IN 90 DAYS 8/11

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 SIXTH SUPPLEMENTAL RESPONSE TO DEFENDANT
BARLETTA/AETNA I-195 WASHINGTON BRIDGE NORTH PHASE 2 JV’S THIRD
REQUEST TO PRODUCE DATED OCTOBER 1, 2025**

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 Sixth Supplemental Responses to Defendant Barletta/Aetna I-195 Washington Bridge North Phase 2 JV’s Third Request to Produce dated October 1, 2025:

53. All text messages and emails between or among Governor Daniel J. McKee and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter, or seeks information that is protected by the attorney-client privilege, deliberative process privilege,

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 2

executive privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure or that it exceeds the scope of the ESI Protocol governing this matter. Plaintiff further objects to this request on the ground that it is overly broad.

FIRST SUPPLEMENTAL RESPONSE: Subject to previously noted objections, Plaintiff will produce email and text communications (if any exist) from Gov. McKee from March 2, 2021, to the present that are related to the repair, maintenance, inspection, and/or closure of the Washington Bridge.

SECOND SUPPLEMENTAL RESPONSE: Please see BATES: RIDOT_000676491-RIDOT_000676538.

THIRD SUPPLEMENTAL RESPONSE: Please see BATES: RIDOT_000676540-RIDOT_000676575.

54. All text messages and emails between or among Deputy Chief of Staff T. Joseph Almond and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, executive privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure or that it exceeds the scope of the ESI Protocol governing this matter. Plaintiff further objects to this request on the ground that it is overly broad.

FIRST SUPPLEMENTAL RESPONSE: Subject to previously noted objections, Plaintiff will produce email and text communications (if any exists) from Mr. Almond from March 2, 2021, to the present that are related to the repair, maintenance, inspection, and/or closure of the Washington Bridge.

SECOND SUPPLEMENTAL RESPONSE: Please see BATES: RIDOT_000676491-RIDOT_000676538.

THIRD SUPPLEMENTAL RESPONSE: Please see BATES: RIDOT_000676540-RIDOT_000676575.

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 3

55. All text messages and emails between or among Peter Alviti, Jr., P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure or that it exceeds the scope of the ESI Protocol governing this matter. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure or that it exceeds the scope of the ESI Protocol governing this matter. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000065257-RIDOT_000118538. Furthermore, discovery is ongoing, and investigation continues.

SECOND SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000454005-RIDOT_000528121.

56. All text messages and emails between or among Robert Rocchio, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING THE WASHINGTON BRIDGE, from January 1, 2017, to the present.

*Cohen Milstein Sellers & Toll, PLLC
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408
Telephone: 561.515.1400 Facsimile: 561.515.1401*

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 4

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure or that it exceeds the scope of the ESI Protocol governing this matter. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

SECOND SUPPLEMENTAL RESPONSE: Please see the attached Excel Bates Chart labeled, "Plaintiff's Third Supplemental Responses to JV's Third Request to Produce – Bates Chart."

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000556313-RIDOT_000621087.

57. All text messages and emails between or among Lori Fisette and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 5

the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000065257-RIDOT_000118538. Furthermore, discovery is ongoing, and investigation continues.

SECOND SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000488522-RIDOT_000496423.

58. All text messages and emails between or among Loren Doyle and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege,

*Cohen Milstein Sellers & Toll, PLLC
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408
Telephone: 561.515.1400 Facsimile: 561.515.1401*

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 6

deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000065257-RIDOT_000118538. Furthermore, discovery is ongoing, and investigation continues.

SECOND SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000526667-RIDOT_000526666.

59. All text messages and emails between or among John Preiss, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number:

*Cohen Milstein Sellers & Toll, PLLC
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408
Telephone: 561.515.1400 Facsimile: 561.515.1401*

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 7

RIDOT_000065257-RIDOT_000118538. Furthermore, discovery is ongoing, and investigation continues.

SECOND SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000538629-RIDOT_000536440.

60. All text messages and emails between or among Dawn Cruz and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

61. All text messages and emails between or among Anthony Pompei, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 8

continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000065257-RIDOT_000118538. Furthermore, discovery is ongoing, and investigation continues.

SECOND SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000618885-RIDOT_000603013.

62. All text messages and emails between or among Keith Gaulin, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 9

SECOND SUPPLEMENTAL RESPONSE: Please see the attached Excel Bates Chart labeled, "Plaintiff's Third Supplemental Responses to JV's Third Request to Produce – Bates Chart."

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000554764-RIDOT_000554765.

63. All text messages and emails between or among Ryan Salvas and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

SECOND SUPPLEMENTAL RESPONSE: Please see the attached Excel Bates Chart labeled, "Plaintiff's Third Supplemental Responses to JV's Third Request to Produce – Bates Chart."

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000621088-RIDOT_000622212.

64. All text messages and emails between or among Chris Hart P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks

*Cohen Milstein Sellers & Toll, PLLC
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408
Telephone: 561.515.1400 Facsimile: 561.515.1401*

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 10

information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

SECOND SUPPLEMENTAL RESPONSE: Please see the attached Excel Bates Chart labeled, "Plaintiff's Third Supplemental Responses to JV's Third Request to Produce – Bates Chart."

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000576384-RIDOT_000580010.

65. All text messages and emails between or among David Fish and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: Please see the Excel Bates Chart attached.

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 11

SECOND SUPPLEMENTAL RESPONSE: Please see the attached Excel Bates Chart labeled, "Plaintiff's Third Supplemental Responses to JV's Third Request to Produce – Bates Chart."

THIRD SUPPLEMENTAL RESPONSE: See BATES RIDOT_000496424-RIDOT_000512562.

66. All text messages and emails between or among Anthony Marchetti and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

See BATES: RIDOT_000657948-RIDOT_000657955.

67. All text messages and emails between or among Sean Raymond P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 12

RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000661373-RIDOT_000672868.

68. All text messages and emails between or among Brian Ferguson and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_000000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000637411-RIDOT_000657947.

69. All text messages and emails between or among John Iglizzi and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, executive privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad.

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 13

70. All text messages and emails between or among Anthony Mako and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000657680-RIDOT_000657947.

71. All text messages and emails between or among Steve Ricci, Sr. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL: See BATES: RIDOT_000672869-RIDOT_000672942.

Cohen Milstein Sellers & Toll, PLLC
11780 US Highway One, Ste 500, Palm Beach Gardens, FL 33408
Telephone: 561.515.1400 Facsimile: 561.515.1401

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 14

72. All text messages and emails between or among Alecia Brouillette and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000624347-RIDOT_000625831.

73. All text messages and emails between or among David Walsh and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 15

FIRST SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000672943-RIDOT_000676185.

74. All text messages and emails between or among Steve Almagno and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

75. All text messages and emails between or among James Orr, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 16

FIRST SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000660113-RIDOT_000661372.

76. All text messages and emails between or among Steven Soderlund and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

77. All text messages and emails between or among George Ley, P.E. and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 17

FIRST SUPPLEMENTAL RESPONSE: Please see the attached Excel Bates Chart labeled, "Plaintiff's Third Supplemental Responses to JV's Third Request to Produce – Bates Chart."

SECOND SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000580011-RIDOT_000582404.

78. All text messages and emails between or among Anthony Cimaglia, III and anyone from RIDOT, the Rhode Island Department of Administration, the Federal Highway Administration, or any other PERSON REGARDING the WASHINGTON BRIDGE, from January 1, 2017, to the present.

RESPONSE: Plaintiff objects to this request for production to the extent that it exceeds the scope of the ESI Protocol governing this matter or that it seeks information that is protected by the attorney-client privilege, deliberative process privilege, the work product doctrine as set forth in Rule 26(b)(3) of the Superior Court Rules of Civil Procedure. Plaintiff further objects to this request on the ground that it is overly broad. Subject to and without waiving the forgoing objections, Plaintiff states that documents responsive to this request, to the extent that they exist and are within Plaintiff's possession, custody, or control have been produced and are identified by the following Bates number: RIDOT_00000001-RIDOT_000064538. Furthermore, discovery is ongoing, and investigation continues. Plaintiff anticipates the production of responsive documents related to the inspection, construction, repair, and/or maintenance of the Washington Bridge by January 5, 2026.

FIRST SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000625832-RIDOT_000632121.

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 18

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

/s/ Sarah W. Rice

Sarah W. Rice, Esq. (#10588)
Assistant Attorney General
Megan Rok, Esq. (#11098)
Special Assistant Attorney General
Rhode Island Office of the Attorney General
150 S. Main Street
Providence, RI 02903
Tel: (401) 274-4400
srice@riag.ri.gov
mrok@riag.ri.gov

/s/ Theodore J. Leopold

Theodore J. Leopold (admitted *pro hac vice*)
Leslie M. Kroeger (admitted *pro hac vice*)
Diana L. Martin (admitted *pro hac vice*)
Poorad Razavi (admitted *pro hac vice*)
Takisha Richardson (admitted *pro hac vice*)
Adnan Toric (admitted *pro hac vice*)
Cohen Milstein
11780 U.S. Highway One, Suite N500
Palm Beach Gardens, FL 33408
[tleopold@cohenmilstein.com](mailto:t Leopold@cohenmilstein.com)
lkroeger@cohenmilstein.com
dmartin@cohenmilstein.com
prazavi@cohenmilstein.com
trichardson@cohenmilstein.com
atoric@cohenmilstein.com

/s/ Jonathan N. Savage

Jonathan N. Savage, Esq. (#3081)
Michael P. Robinson, Esq. (#6306)
Edward D. Pare III, Esq. (#9698)
Savage Law Partners, LLP
564 South Water Street
Providence, RI 02903
Tel: (401) 238-8500

Rhode Island Washington Bridge; 30115.001
Case No.: PC-2024-04526

Page 19

Fax: (401) 648-6748
js@savagelawpartners.com
mrobinson@savagelawpartners.com
epare@savagelawpartners.com

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of May 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