

STATE OF RHODE ISLAND  
PROVIDENCE, SC

SUPERIOR COURT

STATE OF RHODE ISLAND

*Plaintiff,*

v.

AECOM TECHNICAL SERVICES, INC., *et al.*

*Defendant.*

C.A. No. PC-2024-04526

**DEFENDANT AECOM TECHNICAL SERVICES, INC.'S SECOND SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF STATE OF  
RHODE ISLAND**

Pursuant to Rule 34 of the Rhode Island Superior Court Rules of Civil Procedure and the Court's Scheduling Order, Defendant AECOM Technical Services, Inc. ("AECOM"), by its undersigned counsel, hereby requests that Plaintiff State of Rhode Island ("Plaintiff" or the "State") produce the documents requested herein to AECOM's undersigned counsel, Lamontagne, Spaulding & Hayes, LLP, at 100 Midway Road, Suite 15, Cranston, RI 02920, or in such other format, place or manner as may be agreed upon by AECOM and the State or ordered by the Court by all applicable Rules and the Definitions and Instructions set forth below within forty (40) days of service.

**DEFINITIONS**

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

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

3. “Bridge Structure File” means the compilation of records for the Washington Bridge maintained by RIDOT in the ordinary course of business and identified in the State’s Answers to AECOM’s First Set of Interrogatories, including design drawings, as built drawings, inspection reports, maintenance records, rating reports, and any associated indices, inventories, or electronic repositories reflecting the contents of that file.

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

5. “Demolition Materials” means bridge components, concrete, steel, reinforcing steel, post tensioning elements, debris, sediment, fragments, or other materials physically removed from the Washington Bridge in connection with demolition activities.

6. “Document” means, without limitation, any written, printed, typed, photographed, recorded or otherwise reproduced or stored communication or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, or any combination thereof. This definition includes copies or duplicates of documents contemporaneously or subsequently created which have any non-conforming notes or other markings and the backsides of any communication or representation which all contain any of the above.

7. “FHWA” means the Federal Highway Administration, including any present or former employees, officers, representatives, agents, consultants, contractors, or persons acting on its behalf.

8. “Include” or “including” means including, but not limited to.

9. “Litigation” means the above-captioned lawsuit pending in the State of Rhode Island, Providence County Superior Court, docketed as *The State of Rhode Island v. AECOM Technical Services, Inc. et al*, Case No. PC-2024-04526

10. “Person” or “Persons” shall be deemed to mean any natural person or any business, legal, or governmental entity or association.

11. “RIDOT” means the Rhode Island Department of Transportation and includes any departments, segments, divisions, subdivisions, administrative entities and bodies, and other related entities, both presently existing and those which previously existed, of any of the foregoing entities, and any present or former officers, directors, employees, consultants, contractors, attorneys, and agents of the foregoing entity.

12. The terms “referring to”, “relating to”, or “concerning” shall be broadly construed to mean referring to, describing, evidencing, or constituting.

13. The term “Requests” refers to these Requests for Production of Documents.

14. The terms the “State”, “State of Rhode Island”, “You”, and “Your” refer to the State of Rhode Island, and its present or former employees, servants, attorneys, agents, consultants, and other representatives or persons acting on its behalf or under its control.

15. “South Quay” means the South Quay property and/or terminal project located in East Providence, Rhode Island.

16. “Washington Bridge” means the structure formerly known as Washington Bridge North No. 700 (or Bridge No. 070001) carrying Interstate I-195 traffic between Providence and East Providence, Rhode Island.

17. "WJE" means Wiss Janney Elstner Associates, Inc., and its present or former employees, servants, attorneys, agents, consultants and other representatives or persons acting on its behalf under its control.

18. Capitalized terms not defined herein have the meanings given to them in the Amended Complaint.

### **INSTRUCTIONS**

1. These Requests include all Documents in Your possession, custody or control, regardless of where the Documents are located, including all Documents in the possession, custody or control of Your agents (including attorneys). This includes, but is not limited to, Documents stored in shared files, SharePoint or other cloud-based storage sites, document management system folders, or other document repositories within Your possession, custody or control.

2. A copy of a Document that varies in any way whatsoever from the original or from any other copy of the Document, whether by reason of handwritten or other notation or any omission, constitutes a separate Document and must be produced, whether or not the original of such Document is within Your possession, custody, or control.

3. Produce all Documents in the order and format in which they appear in Your files. Documents that, in their original condition, are stapled, clipped, or otherwise fastened together shall be produced in this same condition.

4. If You object to any portion of these Requests, state with specificity the grounds for the objection and produce all Documents and submit all answers responsive to the remainder of the Request(s).

5. These requests are continuing in nature. Any information or documents called for by these Requests that You obtain subsequent to the service of Your response shall promptly be

supplied in the form of supplemental answers and/or document productions pursuant to Super. R. Civ. P. 26(e).

6. Do not refuse to respond to any request (or subpart of any request) on the ground that it is ambiguous, or that the definitions or instructions are ambiguous. Instead, identify the language You believe is ambiguous, the interpretation of the ambiguous language You believe is most reasonable, and respond using that interpretation.

7. If You withhold any Document or Communication in response to any of the requests based upon asserted privilege, work product, or immunity grounds, state the specific privilege or other ground claimed and the nature and basis the same. If You assert that disclosure to a third-party does not waive any privilege, state the basis for that assertion.

#### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

121. All Documents and Communications reflecting, constituting, or responding to any request, inquiry, review, audit, or demand for information by FHWA relating to the demolition of the Washington Bridge, including the FHWA requests made in or about April 2026 and the State's responses thereto, to the extent not previously produced in this Litigation.

122. All Documents and Communications sufficient to identify and describe Demolition Materials removed from the Washington Bridge, including records reflecting: (a) the type, quantity, and condition of such materials; (b) the dates and locations of removal; and (c) the disposition of such materials following removal.

123. All Documents and Communications relating to the transport, handling, storage, reuse, recycling, or disposal of Demolition Materials, including haul logs, weight tickets, manifests, disposal approvals, chain of custody records, and transportation authorizations.

124. All Documents and Communications relating to the transport, placement, storage, processing, or use of Demolition Materials at the South Quay property, including any agreements, approvals, or authorizations governing such activities.

125. All Documents and Communications between the State and FHWA, the Rhode Island Department of Environmental Management (“DEM”) the Rhode Island Coastal Resources Management Council (“CRMC”), or any other governmental entity relating to the handling, disposition, or regulatory oversight of Demolition Materials.

126. All photographs, videos, drone footage, underwater footage, sonar imaging, or other visual recordings depicting demolition activities or Demolition Materials during removal, transport, disposal, or storage, to the extent not previously produced.

127. All Documents constituting and comprising the “Bridge Structure File.”

128. All Documents and Communications relating to or reflecting the State’s review, evaluation, discussion, or analysis of inspection reports concerning the Washington Bridge prepared by AECOM or any other inspection firm.

129. For each AECOM inspection/evaluation report or deliverable that the State contends was deficient or incomplete, all non-privileged drafts, markups, written comments, transmittals, and supporting materials exchanged with the State concerning the content of those deliverables, including all Documents and Communications relating to any State requests for revision, questions, or comments.

130. All Documents and Communications reflecting the factual basis, analyses, recommendations, alternatives considered, and decision-making process leading to the closure of the Washington Bridge on or about December 8, 2023.

131. All Documents and Communications relating to the inspection, cleaning, maintenance, repair, or replacement of drainage systems, joints, joint seals, scuppers, grates, or other water-management features of the Washington Bridge, to the extent not previously produced in this Litigation.

132. All Documents and Communications reflecting the State's internal decision-making, approval authority, or delegation of responsibility concerning engineering, inspection, maintenance, rehabilitation, or testing decisions for the Washington Bridge.

133. All Documents and Communications relating to any request, recommendation, proposal, direction, instruction, authorization, approval, denial, or response concerning the performance of non-destructive testing ("NDT") or subsurface testing of the Washington Bridge.

134. All non privileged Documents and Communications reflecting the factual materials generated, collected, reviewed, or relied upon by WJE in conducting its forensic evaluation of the Washington Bridge.

AECOM TECHNICAL SERVICES, INC.

By Its Attorneys,

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Dated: May 26, 2026