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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.

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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.

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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

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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,

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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:

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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

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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.

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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 Salvias 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

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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.

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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-

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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.

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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.

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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.

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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.

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**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.

**FIRST SUPPLEMENTAL RESPONSE: See BATES: RIDOT_000900193 -
RIDOT_000918950.**

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

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

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.

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

/s/ Sarah W. Rice
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Assistant Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that on the 27th 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