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7 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
8 **IN AND FOR THE COUNTY OF KING**

9 ELIZABETH A. CAMPBELL, an individual,
10
11 Plaintiff,

12 vs.

13 LARS CHRISTIAN MATTHIESEN,
14 SHARON LUCAS, TOENE HAYES,
15 KRISTINE LEANDER, SARAH D.
16 ALAIMO, SWEDISH CULTURAL CENTER
17 d/b/a the SWEDISH CLUB, GARY SUND,
18 SHAMA ALBRIGHT, MOLLY OLSON
19 SMITH, MARY EMERSON, IB R.
20 ODDERSON, LANGDON L. MILLER, NEIL
21 SNYDER, KRIS E. JOHANSSON, MARTIN
22 K. JOHANSSON, ANNA FAINO and LANE
23 POWELL PC,

24 Defendants.

No. 23-2-25128-8 SEA

**PLAINTIFF ELIZABETH A.
CAMPBELL'S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION
PROPOUNDED TO DEFENDANT
GARY SUND**

25 TO: Defendant Gary Sund:

26 In accordance with Washington Superior Court Rules 26 and 33, please answer each of
27 the following interrogatories separately, fully, in writing and under oath. Each answer must be
28 as complete and straightforward as the information reasonably available to you permits after
reasonable inquiry, including the information possessed by your attorneys or agents. If an
interrogatory cannot be answered completely, answer it to the extent possible.

The answers are to be signed by the person to whom they are addressed and must be
served on all parties within thirty (30) days after the service of the interrogatories. NOTE:
Answers must be compliant with the Civil Rules, Local Rules, and Washington State case law,
including the duty set forth in CR 26(e) Supplemental Responses. Include all responsive
information available. For documents, produce in electronic format if possible, per CR
34(b)(2)(E). Objections must state specific grounds (CR 33(b)(4), 34(b)(2)(C)). If claiming
privilege, provide a privilege log (CR 26(b)(5)).

PLAINTIFF'S INTERROGATORIES
AND RFPS TO DEFENDANT GARY SUND – 1

Elizabeth A. Campbell, MPA
3826 24th Ave W
Seattle, WA 98199
206-769-8459
neighborhoodwarrior@gmail.com

DEFINITIONS

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

1. **“DATE” – Date/Time Period.** Unless a specific date or time period is expressly stated in an interrogatory, the time period covered by the interrogatory shall, by default, be from January 1, 2017, to the present date of April 16, 2025.

2. **“DOCUMENTS”** means all hard copy and electronic writings of every kind including, but not limited to, the original and any copy of all records, e-mails, letters, correspondence, appointment books, diaries, files, notes, statements, memoranda, or minutes of meetings, photographs, video, conferences, telephone calls, receipts, written reports or opinions of investigators or experts, status reports, financial statements, audit reports, tax returns, estimates, inventories, contracts, agreements, articles of incorporation, bylaws, stock book, minute book, deed, security agreement, mortgage, deed of trust, title or other insurance policy, report, record, study, hand written note, map, drawing, working paper, chart, paper, draft, index, tape, microfilm, data sheet, data processing card, computer printout, computer program, check, bank statement, passbook, including information recorded and stored electronically, however produced or reproduced, within your possession or subject to your control, of which you have knowledge or to which you have or have had access, or of which any of your agents, attorneys, accountants or consultants have had knowledge.

3. **“DEFENDANT GROUP(S)”** means the groups of defendants and the defense counsel(s) that represent them:

Group 1: Kristine Leander (former Executive Director) and Toene Hayes (former staff accountant), represented by Karen Kalzer.

Group 2: The Swedish Club, Langdon Miller (current board president), Kris Johansson (board member), Sharon Lucas (member/volunteer), and Gary Sund (former board president), represented by Brad Bigos and Alex Lopez.

Group 3: Elizabeth Norgren (former Executive Director), Sarah Alaimo (former HR Director), Shama Albright (former board president), Mary Emerson (former board secretary), Anna Faino (former board vice president), Martin Johansson (former membership chair), Ib Odderson (former board member), Molly Olson Smith (former board vice president), and Neil Snyder (former board member), represented by Megan Starks and Sarah Tatischeff.

Group 4: Lars Matthiesen (club member), represented by Nicholas Larson and Miguel Mendez-Pintado.

4. **“IDENTIFY”- Individuals.** When used in reference to an individual person, parties, participants, or third parties, means to state his or her name, including aliases or former names and **CONTACT INFORMATION** as defined below.

5. **“IDENTIFY”– Entity.** When used with reference to an entity, such as a partnership (either general or limited), joint venture, trust or corporation, to state the full legal name of such entity, each name under which such entity does business, the entity’s telephone number and the
PLAINTIFF’S INTERROGATORIES
AND RFPS TO DEFENDANT GARY SUND – 2

Elizabeth A. Campbell, MPA
3826 24th Ave W
Seattle, WA 98199
206-769-8459
neighborhoodwarrior@gmail.com

1 identity of the chief operating officer, manager, trustee, or other principal representative, and
2 their **CONTACT INFORMATION** as defined below.

3 6. **“IDENTIFY”- Documents.** When used in reference to a document, means the date of
4 preparation of the document, its author, the sender, the recipient, the nature of the document,
5 e.g., letter, memo, tape, or other means of identification sufficient to identify the document, and
6 its present location and custodian. Provide the name, address, and telephone number of the
7 person with possession of the document.

8 7. **“IDENTIFY”- Claims/Lawsuits.** When used in reference to claims or lawsuits means the
9 **CONTACT INFORMATION** of parties and attorneys representing the parties, proceeding
10 number(s), jurisdiction, type of action, and disposition.

11 8. **“IDENTIFY” - Witness/Witnesses.** When used in reference to a witness or witnesses,
12 "identify" means an individual who, by virtue of their presence, participation, or sensory
13 perception (e.g., seeing, hearing, or otherwise experiencing), can provide testimony or
14 information about a specific event, occurrence, or issue pertinent to the case. Additionally, the
15 identification shall include a brief description of the specific event, occurrence, or issue to
16 which the witness’s knowledge or testimony pertains. This includes providing their **contact**
17 **information**, as defined below.

18 9. **“LETTER”** ☐ refers to the anonymous letter sent to and received by Plaintiff via the
19 United States Postal Service on March 14, 2025”, stating:

20 a. “A concerned member wonders how the infamous Kristine Leander has so easily fallen
21 off your radar. After all, she is the evil behind all of this.”

22 b. “How soon you seem to have forgotten her fake friendship? How quick you were to
23 forgive the salacious gossip she spread about you around the club and among the members.
24 One could never expect such quick forgiveness for one who acted as a true ‘mean girl’
25 towards you for the entirety of your relationship. Is it not her fault that you and Lars had such
26 a clamorous and public argument at the Swedish club?”

27 c. “Is Kristine not the reason you no longer work there? How quickly you forget that
28 Kristine is the reason you are no longer allowed to enter the club. This, among many other
immoral things were all a part of her scheme from the beginning.”

d. “You” or “Your” refers to the Defendant to whom the interrogatory is directed, including
agents, employees, or representatives acting on their behalf.

e. “Signed,

1 f. "A concerned member who simply wonders how she so easily has gotten away with her
2 wrongs towards you."¹

3
4 10. "**PERSON**" includes a natural person, company, firm, association, organization,
partnership, business, trust, limited liability company, corporation, or public entity.

5
6 11. "**YOU**" or "**YOUR**" means the party to whom these interrogatories are addressed, your
7 attorneys, agents, employees, officers, representatives, adjusters, investigators, and any other
"person" who is in possession of information on your behalf.

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9 12. "**CONTACT INFORMATION**" means full legal name, nickname(s), current physical
10 residential address, addresses for the past 10 years (residential if a person; business if a
company), dates at each address, e-mail address(es), and current phone numbers (work, mobile,
fax).

11 Dated this 16th Day of April, 2025

12 ELIZABETH A. CAMPBELL, MPA

13 

14 Elizabeth A. Campbell, MPA

15 Plaintiff Pro Se

16 3826 24th Ave W

17 Seattle, WA 98199

18 Tel/Text: 206-769-8459

19 Fax: 206-283-6300

20 neighborhoodwarrior@gmail.com

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¹ Unknown. "Letter to Elizabeth Campbell." United States Postal Service. Postmarked March 6, 2025.

INTERROGATORIES

☐ INTERROGATORY NO. 1.: Identity of the Letter’s Author: Do you have any knowledge of the identity of the person or entity who wrote or sent the Letter to Plaintiff? If yes, state the identity and describe how you obtained this knowledge; from July 1, 2024 to the present.

ANSWER:

☐ INTERROGATORY NO. 2.: Involvement in the Letter: Did you, or anyone acting on your behalf, author, send, or contribute to the drafting or mailing of the Letter? If yes, provide details, including dates, methods, and reasons for your involvement or gaining knowledge of the preparation, transmission of it; from December 1, 2024 to the present.

ANSWER:

☐ INTERROGATORY NO. 3.: Kristine Leander’s Role: The Letter states that “Kristine Leander is the evil behind all of this” and references a “scheme.” Describe any actions, statements, or plans by Kristine Leander, or by you or one of your fellow defendants, or any other person, that you are aware of relating to the termination of Plaintiff’s membership in the Swedish Club, and exclusion from the Swedish Club as a member, as a member of the public, including dates, reasons, and any notices provided to Plaintiff, or of the events described in the First Amended Complaint related to Plaintiff’s Swedish Club membership; from August 15, 2020 to present.

ANSWER:

☐ INTERROGATORY NO. 4.: Alleged Gossip: The Letter claims Kristine Leander spread “salacious gossip” about Plaintiff “around the club and among the members.” Identify all instances you are aware of where Kristine Leander, you, or any other Defendant, member, or other person discussed Plaintiff with club members or staff, including dates, locations, identity of the participants, and the content of those discussions from August 15, 2020 to the present.

ANSWER:

☐ INTERROGATORY NO. 5.: Public Argument with Lars Matthiesen: The Letter references a “clamorous and public argument” between Plaintiff and Defendant Lars Matthiesen

1 at the Swedish Club,² attributing it to Kristine Leander. State whether you have knowledge of
2 this incident, including the date, location, witnesses, and any role Kristine Leander played in
3 causing or escalating it; from January 1, 2021 to the present.

4 **ANSWER:**

5
6 ☐ **INTERROGATORY NO. 6.: Employment Termination:** The Letter asserts that “Kristine
7 is the reason you no longer work there.” Describe all actions taken by Kristine Leander, you, or
8 other Defendants, Swedish Club employees or board members, or third parties, that contributed
9 to Plaintiff’s termination from employment at the Swedish Club, including the identity of any
10 person, dates, reasons provided, and any related communications August 1, 2020 to the present.

11 **ANSWER:**

12 ☐ **INTERROGATORY NO. 7.:Exclusion from the Club:** The Letter states that “Kristine is
13 the reason you are no longer allowed to enter the club.” Identify all decisions, policies, or
14 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
15 members, or third parties, that led to the termination of Plaintiff’s membership and exclusion
16 from the Swedish Club as a member, as a member of the public, including dates, reasons, and
17 any notices provided to Plaintiff; from September 1, 2020 to the present.

18 **ANSWER:**

19 ☐ **INTERROGATORY NO. 8.:Exclusion from the Club:** Identify all decisions, policies, or
20 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
21 members, or third parties, that led to the termination of any Swedish Club member’s
22 membership and exclusion from the Swedish Club as a member, as a member of the public,
23 including dates, reasons, and any notices provided to those members; from June 1, 2019 to the
24 present.

25 **ANSWER:**

26 ☐ **INTERROGATORY NO. 9.: Scheme Allegation:** The Letter claims Plaintiff’s termination
27 and exclusion were “part of [Kristine Leander’s] scheme from the beginning.” Describe any
28 plans, agreements, or coordinated efforts by you or among Defendants or with third parties, to

² On December 17, 2021

1 terminate Plaintiff's employment or the termination of Plaintiff's membership, including
2 participants, timelines, and objectives; from August 15, 2020 to the present.

3 **ANSWER:**

4
5 ☐ **INTERROGATORY NO. 10.: Witnesses:** Identify all individuals (by name, address, and
6 phone number, if known) who have knowledge of the events or statements referenced in the
7 Letter, including those related to Kristine Leander's actions toward Plaintiff; from August 15,
8 2020 to the present.

9 **ANSWER:**

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11 ☐ **INTERROGATORY NO. 11.: Statements Made About Ms. Campbell:** Identify each and
12 every statement you have made, whether oral or written, to any person, regarding Elizabeth A.
13 Campbell's character, behavior, actions, or candidacy for the Swedish Club board from January
14 1, 2022, to the present. For each statement, provide:

- 15 a) The date and time of the statement.
16 b) The name and contact information of each person to whom the statement was made.
17 c) The substance of the statement.
18 d) The context in which the statement was made.
19 e) Whether the statement was made in person, by phone, email, text, or other means.

20 **ANSWER:**

21 ☐ **INTERROGATORY NO. 12.: Speech on April 20, 2022:** Regarding the speech you
22 delivered on April 20, 2022, at the Swedish Club membership meeting:

- 23 a. Did you write the speech yourself? If not, who wrote it?
24 b. If someone else wrote it, did you review and approve it before delivering it?
25 c. Provide the full text of the speech as delivered.
26 d. If there is a recording or transcript of the speech, identify where it can be found.
27 e. What specific reasons did you have for stating that Ms. Campbell was unfit to sit on the
28 board?
f. What "inside knowledge" or "nefarious and unmentionable information" did you refer to in
your speech?
g. Who else was aware of this information, and how did you come to know it?
h. Did you discuss the content of the speech with any other board members, Kristine Leander,
or Vi Reno or others before delivering it? If so, provide details of those discussions.

ANSWER:

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2 **□INTERROGATORY NO. 13.: Executive Session Discussions:** For each Swedish Club
3 board meeting from January 1, 2022, to April 30, 2022, where the board went into executive
4 session to discuss Elizabeth A. Campbell's candidacy, membership status, or any related
5 matters:

- 6 a. Provide the date and time of the meeting and the executive session.
7 b. Identify all persons present during the executive session.
8 c. Describe in detail what was discussed regarding Ms. Campbell.
9 d. Were any decisions made or actions taken regarding her candidacy or membership during the
10 executive session? If so, what were they?
11 e. Were there any votes taken in executive session? If so, what was the outcome?
12 f. Identify any documents or communications related to these executive session discussions.

13 **ANSWER:**

14 **□INTERROGATORY NO. 14.: Interpretation of Bylaws:** Regarding the interpretation that
15 Ms. Campbell was not a "member in good standing" and thus ineligible to run for the board:

- 16 a. Who first suggested this interpretation?
17 b. What was the basis for this interpretation?
18 c. Did you consult with Vi Reno or any other legal advisor about this interpretation? If so, what
19 advice did they provide?
20 d. Were there any communications, emails, or documents discussing this interpretation? If so,
21 identify them.
22 e. Did the board vote on this interpretation? If so, what was the outcome?

23 **ANSWER:**

24 **□INTERROGATORY NO. 15.: Communications with Kristine Leander:** List all
25 communications (including emails, texts, phone calls, in-person conversations) you have had
26 with Kristine Leander regarding Elizabeth A. Campbell from January 1, 2022, to the present.
27 For each communication, provide:

- 28 a) Date and time.
b) Method of communication.
c) Summary of the content related to Ms. Campbell.

ANSWER:

□INTERROGATORY NO. 16.: Communications with Vi Reno: List all communications
(including emails, texts, phone calls, in-person conversations) you have had with Vi Reno

1 regarding Elizabeth A. Campbell from January 1, 2022, to the present. For each communication,
2 provide:

- 3 a) Date and time.
- 4 b) Method of communication.
- 5 c) Summary of the content related to Ms. Campbell.
- 6 d) Whether the communication was in her capacity as a board member or as a legal
7 advisor.

8 **ANSWER:**

9 **□INTERROGATORY NO. 17.: Communications with Other Board Members:** List all
10 communications (including emails, texts, phone calls, in-person conversations) you have had
11 with any other Swedish Club board members regarding Elizabeth A. Campbell from January 1,
12 2022, to the present. For each communication, provide:

- 13 a) Date and time.
- 14 b) Method of communication.
- 15 c) Summary of the content related to Ms. Campbell.

16 **ANSWER:**

17 **□INTERROGATORY NO. 18.: Knowledge of Conspiracy:** Do you have any knowledge of
18 any agreement, plan, or conspiracy among board members, Kristine Leander, or others to
19 prevent Elizabeth A. Campbell from being elected to the board in April 2022? If yes, describe in
20 detail what you know, including who was involved, what actions were taken, and any
21 communications related to this.

22 **ANSWER:**

23 **□INTERROGATORY NO. 19.: Role in Election Rigging:** Did you participate in any actions
24 or decisions aimed at preventing Elizabeth A. Campbell from being elected to the Swedish Club
25 board in April 2022? If yes, describe in detail your involvement and the reasons for such
26 actions.

27 **ANSWER:**

28 **□INTERROGATORY NO. 20.: Awareness of Other Statements:** Are you aware of any
statements made by other board members, Kristine Leander, or others regarding Elizabeth A.

Campbell during the period from January 1, 2022, to the present? If yes, provide details including who made the statement, to whom, when, and the substance of the statement.

ANSWER:

REQUESTS FOR PRODUCTION

☐ **REQUEST FOR PRODUCTION NO. 1) Documents Related to the Letter:** All documents, communications, or drafts related to the creation, sending, or receipt of the Letter, including envelopes, notes, or correspondence discussing its contents or purpose; from December 1, 2024 to the present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 2.) Communications by Kristine Leander:** All documents, including emails, texts, memos, or notes, authored by or involving Kristine Leander that mention Plaintiff, Plaintiff's employment, or Plaintiff's membership at the Swedish Club from August 15, 2020 to the present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 3) Gossip Evidence:** All documents reflecting statements or gossip about Plaintiff made by Kristine Leander, other Defendants, Swedish Club employees or members, or third parties, as referenced in the Letter, including dates and recipients; from August 15, 2020 to the present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 4) Public Argument Records:** All documents, reports, or communications held, received, or transmitted by You related to the "clamorous and public argument" between Plaintiff and Lars Matthiesen at the Swedish Club on the evening of December 17, 2021, including witness statements, incident logs, or correspondence about the incident; from December 17, 2021 to the present.

RESPONSE:

1 ☐ **REQUEST FOR PRODUCTION NO. 5) Employment Termination Records:** All
2 documents related to Plaintiff's termination from employment at the Swedish Club, including
3 personnel files, performance reviews, disciplinary records, emails, meeting notes or
4 communications involving Kristine Leander or other Defendants, Swedish Club employees,
5 board members, or third parties; from March 1, 2021 to present.

6 **RESPONSE:**

7 ☐ **REQUEST FOR PRODUCTION NO. 6) Membership Exclusion Records:** All
8 documents related to Plaintiff's exclusion from the Swedish Club as a member, including
9 membership records, board minutes, board directors'/executive directors' emails between each
10 other or to Plaintiff, or notices sent to Plaintiff, particularly those involving Plaintiff's
11 membership, or Kristine Leander, or communications involving Kristine Leander or other
12 Defendants, Swedish Club employees, board members, or third parties; from August 15, 2020
13 to the present.

14 **RESPONSE:**

15 ☐ **REQUEST FOR PRODUCTION NO. 7) Scheme Documentation:** All documents
16 evidencing any plan, agreement, or "scheme" by Kristine Leander or other Defendants to
17 terminate Plaintiff's employment or revoke Plaintiff's membership, as alleged in the Letter,
18 including internal communications or directives; from December 1, 2021 to the present.

19 **RESPONSE:**

20 ☐ **REQUEST FOR PRODUCTION NO. 8) Defendant Communications:** All
21 communications between Defendants from October 1, 2020 to the present discussing Plaintiff,
22 the Letter, or the claims in this lawsuit.

23 **RESPONSE:**

24 ☐ **REQUEST FOR PRODUCTION NO. 9) Board Meeting Records:** Produce the minutes,
25 agendas, recordings (audio or video), and any other records from all Swedish Club board
26 meetings from October 1, 2021 to April 30, 2022, where Elizabeth A. Campbell was discussed
27 or her candidacy was mentioned.

28 **RESPONSE:**

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2 **□ REQUEST FOR PRODUCTION NO . 10) Executive Session Records:** Produce any
3 minutes, notes, or recordings from executive sessions of the Swedish Club board meetings from
4 October 1, 2021 to April 30, 2022, where Elizabeth A. Campbell was discussed.

5 **RESPONSE:**
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7 **□ REQUEST FOR PRODUCTION NO . 11) Bylaws Interpretation Documents:** Produce
8 all documents related to the interpretation of the Swedish Club bylaws regarding Ms.
9 Campbell's membership status and eligibility to run for the board, including any legal opinions,
10 emails, or notes.

11 **RESPONSE:**
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13 **□ REQUEST FOR PRODUCTION NO . 12) Communications with Kristine Leander:**
14 Produce all communications between you and Kristine Leander regarding Elizabeth A.
15 Campbell from January 1, 2022, to the present.

16 **RESPONSE:**
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18 **□ REQUEST FOR PRODUCTION NO . 13) Communications with Vi Reno:** Produce all
19 communications between you and Vi Reno regarding Elizabeth A. Campbell from January 1,
20 2022, to the present.

21 **RESPONSE:**
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23 **□ REQUEST FOR PRODUCTION NO . 14) Communications with Other Board**
24 **Members:** Produce all communications between you and any other Swedish Club board
25 members regarding Elizabeth A. Campbell from January 1, 2022, to the present.

26 **RESPONSE:**
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28 **□ REQUEST FOR PRODUCTION NO . 15) Election-Related Documents:** Produce all
documents related to the April 2022 Swedish Club board election, including nomination

1 materials, communications among board members, with Kristine Leander, Sharon Lucas or
2 other members about candidates, and records of the membership meeting where you spoke.

3 **RESPONSE:**
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5 **□ REQUEST FOR PRODUCTION NO . 16) Personal Records:** Produce any personal
6 notes, diaries, or journals you have kept that mention Elizabeth A. Campbell or the events
7 leading up to the April 2022 election.

8 **RESPONSE:**
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10 **□ REQUEST FOR PRODUCTION NO . 17) Complaints or Reports:** Produce all
11 documents related to any complaints, reports, or investigations concerning Elizabeth A.
12 Campbell's conduct or membership status.

13 **RESPONSE:**
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DECLARATION OF RESPONDING PARTY

I declare under the penalty of perjury under the laws of the State of Washington that:

- a) I am the Defendant in this action and am authorized to make the foregoing answers.
- b) I have made a reasonable inquiry of all available sources of information such that Plaintiff may rely on these answers as the truthful and complete answers made on behalf of this answering Defendant.
- c) I have read the foregoing answers, know the contents thereof, and believe them to be true and correct.

DATED this ____ day of _____, 2025 at _____, Washington.

Name DEFENDANT - GARY SUND

1 **CERTIFICATE OF SERVICE**

2 I, Elizabeth A. Campbell, certify that on April 16, 2025 I caused to be served a true and
3 correct Word and PDF copy of the foregoing INTERROGATORIES AND REQUEST FOR
4 PRODUCTION TO DEFENDANT GARY SUND via the method indicated below and
5 addressed to the following:

6 Brad Bigos, WSBA No. 52297
7 Alexandro Lopez, WSBA No. 62867
8 O'HAGAN MEYER, PLLC
9 1420 Fifth Avenue, Suite 2200
10 Seattle, WA 98101
11 Tel: (206) 844-1350
12 Email: Bbigos@ohaganmeyer.com
13 Email: alopez@ohaganmeyer.com
14 ☐ CM/ECF System
☐ KC E-File Service
☒ Email
☐ Legal Messenger
☐ U.S. Mail
☐ WA State App Courts' eFiling Portal

15 ***Attorney for Defendant Swedish***
16 ***Cultural Center d/b/a the Swedish Club,***
K. Johansson, Lucas, Miller, and Sund

Megan F. Starks, WSBA No. 39640
Sarah A. Tatistcheff, WSBA No. 51098
PATTERSON BUCHANAN FOBES &
LEITCH, INC., P.S.
1000 Second Ave., 30th Floor
Seattle, WA 98104
Telephone: 206-844-1350
Email: mstarks@pattersonbuchanan.com
Email: SAT@pattersonbuchanan.com
☐ CM/ECF System
☐ KC E-File Service
☒ Email
☐ Legal Messenger
☐ U.S. Mail
☐ WA State App Courts' eFiling Portal

17 ***Attorney for Defendant Alaimo, Albright,***
18 ***Emerson, Faino, M. Johansson, Norgren,***
19 ***Odderson, Smith, and Snyder***

Nicholas C. Larson, WSBA #46034
Miguel E. Mendez-Pintado, WSBA
#61404
Murphy, Pearson, Bradley & Feeney
520 Pike St, Ste 1205
Seattle, WA 98101
206-219-2008
nlarson@mpbf.com
mmendezpintado@mpbf.com
☐ CM/ECF System
☐ KC E-File Service
☒ Email
☐ Legal Messenger
☐ U.S. Mail
☐ WA State App Courts' eFiling Portal

Attorney for Def Matthiesen

Karen Kalzer, WSBA #25429
Hellsell Fetterman
800 Fifth Ave, Suite 3200
Seattle, WA 98104
206-680-2125
kkalzer@hellsell.com
☐ CM/ECF System
☐ KC E-File Service
☒ Email
☐ Legal Messenger
☐ U.S. Mail
☐ WA State App Courts' eFiling Portal

Attorney for Defs Hayes, Leander

I certify under penalty of perjury under the laws of the state of Washington that the foregoing
is true and correct.

DATED April 16, 2025, at Seattle, Washington.



Elizabeth A. Campbell, MPA
Plaintiff, Pro Se
3826 24th Ave W
Seattle, WA 98199
Tel/Text: 206-769-8459
Fax: 206-283-6300
neighborhoodwarrior@gmail.com