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

10 ELIZABETH A. CAMPBELL, an individual,
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
LARS MATTHIESEN**

25 TO: Defendant Lars Matthiesen:

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

PLAINTIFF'S INTERROGATORIES
AND RFPS TO DEFENDANT LARS MATTHIESEN – 1

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

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)).

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 LARS MATTHIESEN – 2

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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

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

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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.: 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. 3.: 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, third party or Yourself discussed Plaintiff with Club board members, members, staff, or third parties including dates, locations, identity of the participants, and the content of those discussions from August 15, 2020 to the present.

ANSWER:

□ INTERROGATORY NO. 4.: Public Argument with Lars Matthiesen: The Letter references a “clamorous and public argument” between Plaintiff and You, Defendant Lars Matthiesen at the Swedish Club,² attributing it to Kristine Leander. State whether you have knowledge of this incident, including the date, location, witnesses, and any role You, Kristine Leander, or any others played in causing or escalating it; from January 1, 2021 to the present.

ANSWER:

² On December 17, 2021

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

6 **ANSWER:**

7 **☐ INTERROGATORY NO. 6.:Exclusion from the Club:** The Letter states that “Kristine is
8 the reason you are no longer allowed to enter the club.” Identify all decisions, policies, or
9 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
10 members, or third parties that led to the termination of Plaintiff’s membership and exclusion
11 from the Swedish Club as a member, as a member of the public, including dates, reasons, and
12 any notices provided to Plaintiff; from September 1, 2020 to the present.

13 **ANSWER:**

14 **☐INTERROGATORY NO. 7.: Scheme Allegation:** The Letter claims Plaintiff’s termination
15 and exclusion were “part of [Kristine Leander’s] scheme from the beginning.” Describe any
16 plans, agreements, or coordinated efforts by you or among Defendants or with third parties, to
17 terminate Plaintiff’s employment or the termination of Plaintiff’s membership, including
18 participants, timelines, and objectives; from August 15, 2020 to the present.

19 **ANSWER:**

20 **☐ INTERROGATORY NO. 8.: Discovery Regarding Lars Matthiesen's Relationship with**
21 **Elizabeth Campbell:** Describe in detail the nature and extent of your personal relationship with
22 Elizabeth Campbell outside of Swedish Club activities from July 1985 to the present, including
23 the frequency of contact, types of interactions (e.g., social, romantic, professional), and any
24 specific events or activities you engaged in together.

25 **ANSWER:**

26 **☐ INTERROGATORY NO. 9.: Discovery Regarding Lars Matthiesen's Relationship with**
27 **Kristine Leander and Impact on Elizabeth Campbell:** Did you and Kristine Leander ever
28 discuss Elizabeth Campbell’s employment at the Swedish Club, her termination, or her
membership status? If so, provide the dates, locations, and a detailed summary of each such
discussion, including any statements you made about Campbell.

1 **ANSWER:**

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4 ☐ **INTERROGATORY NO. 10.: Discovery Regarding Lars Matthiesen's Relationship**
5 **with Kristine Leander and Impact on Elizabeth Campbell:** Identify and summarize all
6 statements you made to Kristine Leander about Elizabeth Campbell from January 1, 2020, to the
7 present, including but not limited to her character, job performance, membership status, or
8 personal life, and provide the approximate dates and circumstances of each statement.

9 **ANSWER:**

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11 ☐ **INTERROGATORY NO. 11.: Discovery Regarding Lars Matthiesen's Relationship**
12 **with Kristine Leander and Impact on Elizabeth Campbell:** Did you participate in or witness
13 any activities with Kristine Leander, as alleged for example in paragraphs 1.17 et seq. of the
14 First Amended Complaint, intended to “destabilize the decades-long friendship and intimate
15 relationship” between you and Elizabeth Campbell? If so, describe those activities in detail,
16 including dates, locations, and your role or motivations.

17 **ANSWER:**

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20 ☐ **INTERROGATORY NO. 12.:** Describe in detail the nature and extent of your relationship
21 with Ms. Campbell from 1985 to the present, including the frequency, locations, and content of
22 your communications (in-person, telephonic, electronic, or otherwise), and identify any periods
23 of interruption or change in the relationship.

24 **ANSWER:**

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27 ☐ **INTERROGATORY NO. 13.:** Describe all representations you made to Ms. Campbell
28 regarding your marital status with Yara H.O. Silva from 1990 to the present, including any
statements about your intent to divorce Silva (e.g., Case No. 23-2-25128-8 SEA, ¶¶ 5.17–5.20,
5.43–5.46), and whether those representations were true at the time they were made.

ANSWER:

☐ **INTERROGATORY NO. 14.:** Identify all instances in which you provided Ms. Campbell
with financial support, gifts, or payments (e.g., dental work in 2019, Case No. 23-2-25128-8

SEA, ¶ 5.33), including the date, amount, method of payment, and your stated or intended purpose for each.

ANSWER:

□INTERROGATORY NO. 15.: Describe all statements you made to third parties (including but not limited to Swedish Club members, Highland employees, friends, or business associates) about Ms. Campbell from 2020 to the present, including the content, date, and context of each statement, and identify each recipient.

ANSWER:

□INTERROGATORY NO. 16.: Identify all actions you took, individually or in concert with others (e.g., Kristine Leander, Yara H.O. Silva, Judy Cooper, Karen Choyce, Jan Sullivan, or Swedish Club members), that impacted Ms. Campbell's membership rights or employment at the Swedish Club from 2020 to 2023 (e.g., Case No. 23-2-25195-4 SEA, and explain your motivation for each action.

ANSWER:

□INTERROGATORY NO. 17.: Describe your role and ownership interest in Highland Holdings, Inc. from 2015 to the present, including any plans or attempts to sell your interest (e.g., to Patrick C. Fossey, Case No. 23-2-25128-8 SEA, ¶¶ 5.28–5.32), and explain how these plans related to your representations to Ms. Campbell about your marital status or future intentions, and the reason you were seeking her assistance to document your real estate transactions.

ANSWER:

□INTERROGATORY NO. 18.: Identify all individuals with whom you discussed Ms. Campbell's personal life, her relationship with you, her reputation, or Swedish Club activities from 2020 to the present, including but not limited to Diane, Sandy, or any of the other individuals referenced in Exhibit P-7 (Case No. 23-2-25195-4 SEA, Pages 475–476), and provide the date and substance of each discussion.

ANSWER:

1 **□INTERROGATORY NO. 19.:** Describe all instances in which you visited Ms. Campbell's
2 home or she visited your Highland office from 2019 to 2021 (e.g., Case No. 23-2-25128-8 SEA,
3 ¶¶ 5.9, 5.27), including the dates, duration, and purpose of each visit, and whether any third
4 parties were present or aware.

5 **ANSWER:**

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7 **□INTERROGATORY NO. 20.:** Identify all financial transactions, agreements, or negotiations
8 between you and Yara H.O. Silva from 2015 to the present related to your marital community,
9 Highland, or PEP Properties, L.L.C., that you discussed with Ms. Campbell (e.g., Case No. 23-2-
10 25128-8 SEA, ¶ 5.43), and state whether those discussions influenced your actions toward Ms.
11 Campbell.

12 **ANSWER:**

13 **□INTERROGATORY NO. 21.:** State whether you have ever made statements to Ms.
14 Campbell or others suggesting that Ms. Campbell was emotionally unstable, untrustworthy, or
15 otherwise unfit as a friend, lover, or Swedish Club member/employee. If so, provide the date,
16 context, and recipients of each statement.

17 **ANSWER:**

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19 **□INTERROGATORY NO. 22.:** Describe any physical altercations or verbal abuse between
20 you and Yara H.O. Silva that you disclosed to Ms. Campbell (e.g., Case No. 23-2-25128-8 SEA,
21 ¶¶ 4.23, 4.24), including the date, location, and details of each incident, and whether any third
22 parties witnessed or were informed of these events.

23 **ANSWER:**

24 **Interrogatories Related to Matthiesen's Answer to First Amended Complaint³**

25 **□ INTERROGATORY NO. 23.:** Identify all persons who have knowledge of any facts
26 relevant to the allegations in the First Amended Complaint or your defenses thereto, and describe
27 the nature of their knowledge.

28 **ANSWER:**

³ King County Superior Court Case No. 23-2-25195-4 Docket Item #376/377

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Interrogatories Related to Matthiesen's Denials

☐ **INTERROGATORY NO. 24.:** Regarding your denial of the allegations in paragraph 3.8 and 4.8 of the First Amended Complaint (except for your admission of residency in Washington, and except for your admission of marriage to Yara Silva), specify all facts, documents, and witnesses that supports your denial.

ANSWER:

☐ **INTERROGATORY NO. 25.:** Regarding your affirmative defense that DENIAL none of Plaintiff's alleged damages occurred as the proximate result of any act or omission for which Defendant is responsible, (Defense 2), specify all facts, documents, and witnesses that supports your denial.

ANSWER:

Interrogatories Related to Matthiesen's Affirmative Defenses

☐ **INTERROGATORY NO. 26.:** Regarding your affirmative defense that the Complaint fails to state a claim upon which relief can be granted, (Defense 1), specify:

- a. Each cause of action in the FAC (e.g., assault, battery, defamation) you contend fails to state a claim;
- b. The factual or legal elements you believe are insufficiently alleged for each cause of action;
- c. All legal authorities supporting your contention;
- d. All facts, documents, and witnesses supporting your position.

ANSWER:

☐ **INTERROGATORY NO. 27.:** Regarding your affirmative defense that the plaintiff's damages were caused by the acts or omissions or failures to act of the plaintiff and/or third parties, (Defense 3), specify:

- a. Each action or omission by Plaintiff and/or third parties you claim caused her damages;
- b. The dates of those actions or omissions;
- c. How they contributed to her harm or bar her claims;
- d. All facts, documents, and witnesses supporting your contention.

ANSWER:

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2 **□ INTERROGATORY NO. 28.:** Regarding your affirmative defense that Plaintiff's damages,
3 if any, are speculative and uncertain, (Defense 4), identify and describe in detail each specific
4 aspect of the Plaintiff's damage claims that you contend are speculative or uncertain.

- 5 a. For each aspect identified in response explain why you believe it is speculative or uncertain,
6 including any facts, circumstances, or legal principles that support your position.
7 b. State whether you contend that any portion of the Plaintiff's damages are not directly linked
8 to your actions or omissions. If so, identify those portions and explain the basis for your
9 contention.
10 c. Identify and describe any evidence, including documents, expert opinions, or other materials,
11 that you believe supports your claim that the Plaintiff's damages are speculative or uncertain.
12 d. Do you contend that any of the Plaintiff's damages are for future losses? If so:
13 i. Identify which damages are for future losses.
14 ii. Explain why you believe these future losses are speculative or uncertain.
15 iii. Describe any methods or calculations the Plaintiff has used to estimate these future losses,
16 and explain why you believe those methods or calculations are insufficient or unreliable.
17 e. Identify any inconsistencies or contradictions in the Plaintiff's damage claims, including
18 discrepancies in the amounts claimed or in the methods used to calculate the damages, and
19 explain how these inconsistencies support your defense.
20 f. Describe any legal standards, precedents, or principles that you rely upon to support your
21 assertion that speculative or uncertain damages are not recoverable.
22 g. Have you or your representatives made any statements or admissions regarding the
23 speculative or uncertain nature of the Plaintiff's damages? If so, please describe those
24 statements or admissions, including when and to whom they were made.
25 h. Identify all witnesses, including experts, whom you intend to call to testify in support of this
26 affirmative defense, and provide a summary of their expected testimony.
27 i. Describe any actions or steps you have taken to investigate or verify the Plaintiff's damage
28 claims, and explain how the results of those actions support your defense that the damages
are speculative or uncertain.

ANSWER:

22 **□ INTERROGATORY NO. 29.:** Regarding your affirmative defense that Plaintiff failed to
23 mitigate and/or attempt to mitigate her damages, if any have been or will be sustained, and any
24 recovery by Plaintiff must be diminished by reason thereof, (Defense 5), specify:

- 25 a. State all facts that support this affirmative defense.
26 b. Identify all actions that you contend Plaintiff should have taken to mitigate her damages but
27 did not.
28 c. Describe any communications or advice given to Plaintiff regarding the mitigation of her
damages, including who provided the advice, when it was provided, and the content of the
advice.
d. Specify the time period during which you allege Plaintiff failed to mitigate her damages.
e. Identify all documents, witnesses, or other evidence that support this affirmative defense.

1 f. Describe how Plaintiff's damages would have been different if she had taken the actions you
2 contend she should have taken to mitigate her damages.

3 **ANSWER:**

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5 ☐ **INTERROGATORY NO. 30.:** Regarding your affirmative defense that people or entities
6 other than Defendant caused or contributed to the damages Plaintiff claims to have suffered.
7 Therefore, any award made in favor of Plaintiff in this case must be reduced by an amount equal
8 to the percentage of fault of others in causing or contributing to the damages alleged in the
9 Complaint, (Defense 6), specify:

- 10 a. Each action or omission by others you claim caused her damages;
11 b. The dates of those actions or omissions;
12 c. How they contributed to her harm or bar her claims;
13 d. All facts, documents, and witnesses supporting your contention.

14 **ANSWER:**

15 ☐ **INTERROGATORY NO. 31.:** Regarding your affirmative defense that intervening and
16 superseding actions beyond Defendant's control caused Plaintiff's damages if any, (Defense 7),
17 specify:

- 18 a. Each intervening and superseding actions beyond Defendant's control you claim caused her
19 damages;
20 b. The dates of those intervening and superseding actions;
21 c. How they contributed to her harm or bar her claims;
22 d. All facts, documents, and witnesses supporting your contention.

23 **ANSWER:**

24 ☐ **INTERROGATORY NO. 32.:** Regarding your affirmative defense that Plaintiff's claims are
25 barred by equitable defenses, (Defenses 8, 10 laches), specify for each defense:

- 26 a. The specific actions or omissions by Plaintiff supporting the defense;
27 b. The dates of those actions or omissions;
28 c. How they bar Plaintiff's claims;
d. All facts, documents, and witnesses supporting your contention.

ANSWER:

1 ☐ **INTERROGATORY NO. 33.:** Regarding your affirmative defense that Plaintiff's claims are
2 barred by the applicable statute of limitations, (Defense 9), specify:

- 3 a. Each cause of action you contend is time-barred;
4 b. The applicable statute of limitations for each;
5 c. The date you believe each claim accrued and why;
6 d. All facts, documents, and witnesses supporting your contention.

7 **ANSWER:**

8 **REQUESTS FOR PRODUCTION**

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

12 **RESPONSE:**

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

17 **RESPONSE:**

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

23 **RESPONSE:**

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

RESPONSE:

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

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

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

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

25 **RESPONSE:**
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28 **□ REQUEST FOR PRODUCTION NO. 9) Defendant Communications:** Produce all
emails, text messages, letters, or other written or electronic communications between you and

Kristine Leander from January 1, 2020, to the present discussing Elizabeth Campbell, her employment at the Swedish Club, her termination, her membership status, or any alleged mistreatment of her by Leander or others.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 10) Defendant Communications:** Produce any notes, diaries, journals, or other records in your possession reflecting discussions or interactions with Kristine Leander about Elizabeth Campbell's employment, termination, membership rights, or alleged mistreatment from January 1, 2020, to the present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 11) Defendant Communications:** Produce all communications (e.g., emails, texts, memos) between you and Kristine Leander from January 1, 2020, to the present that relate to actions or decisions impacting Elizabeth Campbell's job at the Swedish Club, including but not limited to her termination.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 12) Defendant Communications:** Produce all communications (e.g., emails, texts, memos) between you and Kristine Leander from January 1, 2020, to the present that relate to actions or decisions impacting Elizabeth Campbell's membership rights at the Swedish Club, including but not limited to her attendance at board meetings or participation in club events.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 13) Defendant Communications:** Produce any documents, recordings, or correspondence in your possession reflecting statements you made to Kristine Leander about Elizabeth Campbell, her character, job performance, membership status, or personal life from January 1, 2020, to the present.

RESPONSE:

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3 **□ REQUEST FOR PRODUCTION NO. 14) Defendant Communications:** Produce any
4 communications or records in your possession from January 1, 2020, to the present
5 documenting activities or discussions with Kristine Leander intended to interfere with or
6 destabilize your relationship with Elizabeth Campbell, as alleged in paragraph 1.17 of the First
7 Amended Complaint.

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10 **RESPONSE:**

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12 **□ REQUEST FOR PRODUCTION NO. 15)** Produce all communications between you and
13 Yara H.O. Silva from January 1, 2015, to the present regarding Ms. Campbell, your marital
14 status, or your intent to divorce, including any prenuptial or postnuptial agreements referenced in
15 Case No. 23-2-25128-8 SEA (e.g., ¶ 4.13).

16
17 **RESPONSE:**

18
19
20 **□ REQUEST FOR PRODUCTION NO. 16)** Produce all communications between you and
21 Kristine Leander, Elizabeth M. Norgren, or any Swedish Club affiliate (e.g., board members,
22 employees) from January 1, 2020, to the present regarding Ms. Campbell's membership,
23 employment, or personal reputation (e.g., Case No. 23-2-25195-4 SEA, ¶¶ 1.17–1.20, 1.24).

24
25 **RESPONSE:**

26
27 **□ REQUEST FOR PRODUCTION NO. 17)** Produce all financial records (e.g., bank
28 statements, receipts, invoices) documenting payments or gifts you provided to Ms. Campbell
from 2019 to 2021, including but not limited to dental work payments referenced in Case No.
23-2-25128-8 SEA (¶ 5.33).

RESPONSE:

□ REQUEST FOR PRODUCTION NO. 18) Produce all social media posts, comments, or
messages (including metadata) you made or received from 2020 to the present referencing Ms.
Campbell, Diane, Sandy, or any alleged romantic entanglements, as referenced in Exhibit P-7
(Case No. 23-2-25195-4 SEA, Pages 475–476).

RESPONSE:

1
2
3
4 **□ REQUEST FOR PRODUCTION NO. 19)** Produce all non-privileged correspondence
5 between you and Vi Reno or any legal counsel from 2019 to the present regarding your marital
6 status, divorce proceedings, or Ms. Campbell (e.g., Case No. 23-2-25128-8 SEA, ¶ 5.44).

7
8 **RESPONSE:**

9
10 **□ REQUEST FOR PRODUCTION NO. 20)** Produce all documents evidencing your
11 attendance or participation in Swedish Club board meetings, committee meetings, or events from
12 2020 to 2023, including agendas, minutes, or notes where Ms. Campbell's membership or
13 employment was discussed (e.g., Case No. 23-2-25195-4 SEA, ¶¶ 1.20–1.23).

14 **RESPONSE:**

15
16 **□ REQUEST FOR PRODUCTION NO. 21)** Produce all communications between you and
17 third parties (e.g., Diane, Sandy, et al, Swedish Club members) from 2020 to the present
18 discussing Ms. Campbell's personal life, reputation, or your relationship with her, as referenced
19 in Exhibit P-7 (Case No. 23-2-25195-4 SEA, Pages 475–476).

20 **RESPONSE:**

21
22 **□ REQUEST FOR PRODUCTION NO. 22)** Produce all records (e.g., itineraries, receipts,
23 tickets) from 2019 to 2021 reflecting assignments you shared with Ms. Campbell, including but
24 not limited to those listed in Case No. 23-2-25128-8 SEA (¶ 5.34).

25 **RESPONSE:**

26
27 **□ REQUEST FOR PRODUCTION NO. 23)** Produce all documents related to any mediation,
28 counseling, or settlement discussions between you and Yara H.O. Silva from 2020 to 2021, as
referenced in Case No. 23-2-25128-8 SEA (¶¶ 5.44–5.45).

RESPONSE:

1 **□ REQUEST FOR PRODUCTION NO. 24)** Produce all calendars, schedules, or diaries from
2 2019 to 2023 documenting your meetings, calls, or visits with Ms. Campbell, whether at her
3 home, Highland's office, or elsewhere (e.g., Case No. 23-2-25128-8 SEA, ¶¶ 5.9, 5.27).

4 **RESPONSE:**

5
6 **□ REQUEST FOR PRODUCTION NO. 25.: Corresponding to Interrogatory No. 24:**

7 Produce all documents, including but not limited to witness statements, affidavits, and
8 communications, that relate to the knowledge of any persons regarding the allegations in the
9 First Amended Complaint or your defenses thereto.

10 **RESPONSE:**

11
12 **□ REQUEST FOR PRODUCTION NO. 26.: Corresponding to Interrogatory No. 24:**

13 Produce all documents that support your denial of the allegations in paragraphs 3.8 and 4.8 of the
14 First Amended Complaint, excluding the allegations you have admitted (i.e., your residency in
15 Washington and your marriage to Yara Silva).

16 **RESPONSE:**

17
18 **□ REQUEST FOR PRODUCTION NO. 27.: Corresponding to Interrogatory No. 25:**

19 Produce all documents that support your affirmative defense that none of Plaintiff's alleged
20 damages occurred as the proximate result of any act or omission for which you are responsible
21 (Defense 2).

22 **RESPONSE:**

23
24 **□ REQUEST FOR PRODUCTION NO. 28.: Corresponding to Interrogatory No. 26:**

25 Produce all documents that you contend support your affirmative defense that the Complaint
26 fails to state a claim upon which relief can be granted (Defense 1), including any documents
27 related to the facts or positions supporting your contention.

28 **RESPONSE:**

□ REQUEST FOR PRODUCTION NO. 29.: Corresponding to Interrogatory No. 27:

Produce all documents that evidence the actions or omissions of the Plaintiff and/or third parties that you claim caused or contributed to the Plaintiff's damages (Defense 3).

RESPONSE:

□ REQUEST FOR PRODUCTION NO. 30.: Corresponding to Interrogatory No. 28:

Produce all documents that support your contention that the Plaintiff's damages are speculative or uncertain (Defense 4), including but not limited to documents related to the calculation of damages, expert reports, and any evidence of inconsistencies in the Plaintiff's damage claims.

RESPONSE:

□ REQUEST FOR PRODUCTION NO. 31.: Corresponding to Interrogatory No. 29:

Produce all documents that support your affirmative defense that the Plaintiff failed to mitigate her damages (Defense 5), including but not limited to communications advising her to mitigate, records of actions she could have taken, and evidence of how her damages would have been different if she had mitigated.

RESPONSE:

□ REQUEST FOR PRODUCTION NO. 32.: Corresponding to Interrogatory No. 30:

Produce all documents that evidence the actions or omissions of people or entities other than yourself that caused or contributed to the Plaintiff's damages (Defense 6).

RESPONSE:

□ REQUEST FOR PRODUCTION NO. 33.: Corresponding to Interrogatory No. 31:

Produce all documents that evidence the intervening and superseding actions beyond your control that you claim caused the Plaintiff's damages (Defense 7).

RESPONSE:

□ REQUEST FOR PRODUCTION NO. 34.: Corresponding to Interrogatory No. 32:

Produce all documents that support your equitable defenses, including but not limited to

documents showing the Plaintiff's actions or omissions that bar her claims under the doctrines of laches or other equitable principles (Defenses 8 and 10).

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 35.: Corresponding to Interrogatory No. 33:**

Produce all documents that support your affirmative defense that the Plaintiff's claims are barred by the applicable statute of limitations (Defense 9), including but not limited to dated communications, contracts, or other evidence showing when the claims accrued.

RESPONSE:

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 - LARS MATTHIESEN

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 LARS MATTHIESEN 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
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☐ 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.



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