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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
LANGDON MILLER**

25 TO: Defendant Langdon Miller:

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 LANGDON MILLER – 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

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.

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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.

8
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 others that contributed to
9 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 others that led to the termination of Plaintiff’s membership and exclusion from the
16 Swedish Club as a member, as a member of the public, including dates, reasons, and any
17 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, Yourself, Swedish Club employees or
21 board members, or others 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. Yourself, or with others

² On December 17, 2021

1 to 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:**

10
11 ☐ **INTERROGATORY NO. 11.: Formation Date:** State the date on which the governance
12 and bylaws committee was officially formed by the Swedish Club's board of directors.

13 **ANSWER:**

14
15 ☐ **INTERROGATORY NO. 12.: Purpose and Objectives:** Describe the purpose and
16 objectives of the governance and bylaws committee as established by the Swedish Club's board
17 of directors.

18 **ANSWER:**

19
20 ☐ **INTERROGATORY NO. 13.: Committee Membership:** Identify each person who has
21 served as a member of the Swedish Club's governance and bylaws committee from its formation
22 to the present, including their full name, role on the committee, and the dates of their service.

23 **ANSWER:**

24
25 ☐ **INTERROGATORY NO. 14.: Meeting List:** List all meetings held by the governance and
26 bylaws committee from its formation to the present, including the date, time, location, and
27 attendees of each meeting. For each meeting identified provide a detailed summary of the topics
28 discussed, any decisions made, and any actions taken or proposed.

ANSWER:

1
2 **□ INTERROGATORY NO. 15.: Communications with Langdon Miller- You:** Identify all
3 communications, including but not limited to emails, letters, memoranda, and notes, between
4 members of the governance and bylaws committee and You from July 1, 2024, to the present,
5 that relate to the committee's activities, including but not limited to any proposed changes to the
6 Swedish Club's bylaws, or member conduct standards.

7
8 **ANSWER:**

9 **□ INTERROGATORY NO. 16.: Communications with Board Members:** Identify all
10 communications between members of the governance and bylaws committee and You and other
11 members of the Swedish Club's board of directors from July 1, 2024, to the present, that relate
12 to the committee's activities, proposed changes to the bylaws, or member conduct standards.

13
14 **ANSWER:**

15 **□ INTERROGATORY NO. 17.: Communications with Executive Director:** Identify all
16 communications between You, and/or members of the governance and bylaws committee and
17 the executive director of the Swedish Club from July 1, 2024, to the present, that relate to the
18 committee's activities, proposed changes to the bylaws, or member conduct standards.

19
20 **ANSWER:**

21 **□ INTERROGATORY NO. 18.: Proposed Bylaw Amendments:** Describe in detail any
22 proposed amendments or changes to the Swedish Club's bylaws that have been discussed,
23 drafted, or considered by the governance and bylaws committee.

24
25 **ANSWER:**

26 **□ INTERROGATORY NO. 19.: Proposed Member Conduct Standards:** Describe in detail
27 any member conduct standards, codes of conduct, or similar policies that have been discussed,
28 drafted, or considered by the governance and bylaws committee.

ANSWER:

1 **□ INTERROGATORY NO. 20.: Experts and Legal Advisors:** Identify all experts,
2 consultants, or legal advisors who have provided advice, consultation, or services to the
3 governance and bylaws committee regarding the reform of the Swedish Club's governance,
4 bylaws, or member conduct standards. For each individual identified state the dates on which
advice or services were provided and the general topics addressed, without disclosing privileged
information.

5 **ANSWER:**

6

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8 **□ INTERROGATORY NO. 21.: Discussions on Membership Terminations:** Has the
9 governance and bylaws committee discussed or considered the termination of any member's
10 membership, including but not limited to the termination of Elizabeth A. Campbell's
11 membership on March 9, 2023 or any other member's membership? If so, describe in detail the
nature of those discussions and any conclusions reached.

12 **ANSWER:**

13

14 **□ INTERROGATORY NO. 22.: Reasons for Committee Formation:** What prompted the
15 formation of the governance and bylaws committee? Please describe the reasons and
circumstances that led to its establishment.

16 **ANSWER:**

17

18

19 **□ INTERROGATORY NO. 23.: Retroactive Justifications:** Has the governance and bylaws
20 committee proposed or discussed any changes to the bylaws or policies that would retroactively
21 justify or validate past actions taken by the Swedish Club, its board, or its officers, including but
22 not limited to the termination of members' memberships? If so, describe those proposed changes
and the discussions surrounding them.

23 **ANSWER:**

24

25 **□ INTERROGATORY NO. 24.: Member Input:** Has the governance and bylaws committee
26 sought or received any input, feedback, or comments from Swedish Club members regarding
27 proposed changes to the bylaws or member conduct standards? If so, describe how this input
was solicited and summarize the feedback received.

28 **ANSWER:**

1
2 **□ INTERROGATORY NO. 25.: Proposed Termination Procedures:** Has the governance
3 and bylaws committee discussed or proposed any procedures for terminating a member's
4 membership, including notice requirements, due processes, or appeal mechanisms? If so,
5 describe those proposed procedures in detail.

6 **ANSWER:**

7
8 **□ INTERROGATORY NO. 26.: Legal Opinions on Compliance:** Has the governance and
9 bylaws committee obtained any legal opinions or reviews regarding the compliance of proposed
10 bylaw changes or member conduct standards with applicable laws, including but not limited to
11 RCW 24.03A? If so, describe the findings of such reviews, without disclosing privileged
12 information.

13 **ANSWER:**

14 **□ INTERROGATORY NO. 27.: Identify Former Leader:** Identify the “former leader”
15 referred to in the Board President’s Letter dated February 2025, who is alleged to have made
16 multiple false allegations about the Swedish Club, its leadership, and certain members and
17 employees.

18 **ANSWER:**

19 **□ INTERROGATORY NO. 28.: Board Member History:** List all individuals who served
20 on the Swedish Club’s board of directors from January 1, 2022, to the present, including their
21 terms of service. For each individual who is no longer serving on the board, state the date they
22 left the board and the reason for their departure (e.g., term expired, resigned, removed).

23 **ANSWER:**

24
25 **□ INTERROGATORY NO. 29.: Former Complaints:** Identify any former members or
26 leaders, or employees (past or present) of the Swedish Club who have filed lawsuits, formal
27 complaints, or made public statements against the club, its leadership, or its employees from
28 January 1, 2022, to the present.

ANSWER:

1
2 ☐ **INTERROGATORY NO. 30.: Defendant Status:** Is the “former leader” referred to in the
3 Board President’s Letter dated February 2025 one of the defendants in this lawsuit? If yes,
4 please identify which defendant.

5 **ANSWER:**
6

7 ☐ **INTERROGATORY NO. 31.: Lawsuit Role:** Describe your role in the Swedish Club’s
8 defense of this lawsuit, including any meetings you attended where the lawsuit was discussed,
9 the dates of those meetings, and the other attendees.

10 **ANSWER:**
11

12 ☐ **INTERROGATORY NO. 32.:Lawsuit Influence on Committee:** Did the filing of the
13 lawsuit by Elizabeth A. Campbell influence the decision to form the governance and bylaws
14 committee or the scope of its work? If so, please explain how.

15 **ANSWER:**
16

17 **REQUESTS FOR PRODUCTION**

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

22 **RESPONSE:**
23

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

28 **RESPONSE:**

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

4 **RESPONSE:**

5
6 ☐ **REQUEST FOR PRODUCTION NO. 4) Public Argument Records:** All documents,
7 reports, or communications held, received, or transmitted by You related to the “clamorous and
8 public argument” between Plaintiff and Lars Matthiesen at the Swedish Club on the evening of
9 December 17, 2021, including witness statements, incident logs, or correspondence about the
incident; from December 17, 2021 to the present.

10 **RESPONSE:**

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

16 **RESPONSE:**

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18 ☐ **REQUEST FOR PRODUCTION NO. 6) Membership Exclusion Records:** All
19 documents related to Plaintiff’s exclusion from the Swedish Club as a member, including
20 membership records, board minutes, board directors’/executive directors’ emails between each
21 other or to Plaintiff, or notices sent to Plaintiff, particularly those involving Plaintiff’s
22 membership, or Kristine Leander, or communications involving Kristine Leander or other
23 Defendants, Swedish Club employees, board members, or third parties; from August 15, 2020
to the present.

24 **RESPONSE:**

25
26 ☐ **REQUEST FOR PRODUCTION NO. 7) Scheme Documentation:** All documents
27 evidencing any plan, agreement, or “scheme” by Kristine Leander or other Defendants to
28 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.

RESPONSE:

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

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8 **RESPONSE:**

9
10 ☐ **REQUEST FOR PRODUCTION NO. 9.: Formation Documents:** All documents related
11 to the formation of the governance and bylaws committee, including but not limited to board
12 meeting minutes, resolutions, emails, and memoranda discussing or approving its establishment.

13 **RESPONSE:**

14
15 ☐ **REQUEST FOR PRODUCTION NO. 10.: Meeting Records:** All meeting minutes,
16 agendas, notes, and recordings from meetings of the governance and bylaws committee from its
17 formation to the present.

18 **RESPONSE:**

19
20 ☐ **REQUEST FOR PRODUCTION NO. 11.: Communications with Langdon Miller/You:**
21 All communications, including emails, letters, memoranda, and notes, between members of the
22 governance and bylaws committee and You from July 1, 2024, to the present, that relate to the
23 committee's activities, proposed changes to the bylaws, or member conduct standards.

24 **RESPONSE:**

25
26 ☐ **REQUEST FOR PRODUCTION NO. 12.: Communications with Board Members:** All
27 communications between members of the governance and bylaws committee and Yourself, or
28 other members of the Swedish Club's board of directors from July 1, 2024, to the present, that
relate to the committee's activities, proposed changes to the bylaws, or member conduct
standards.

RESPONSE:

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2 **☐ REQUEST FOR PRODUCTION NO. 13.: Communications with Executive Director:**

3 All communications between You, members of the governance and bylaws committee and the
4 executive director of the Swedish Club from July 1, 2024, to the present, that relate to the
committee's activities, proposed changes to the bylaws, or member conduct standards.

5 **RESPONSE:**

6

7

8 **☐ REQUEST FOR PRODUCTION NO. 14.: Communications with Members:** All
9 communications between members of the governance and bylaws committee and Yourself, and
10 members of the Swedish Club from July 1, 2024, to the present, that relate to the committee's
activities, proposed changes to the bylaws, or member conduct standards.

11 **RESPONSE:**

12

13 **☐ REQUEST FOR PRODUCTION NO. 15.: Draft Bylaws:** All draft versions of the Swedish
14 Club's bylaws or proposed amendments to the bylaws that have been created, circulated, or
discussed by the governance and bylaws committee.

15 **RESPONSE:**

16

17

18 **☐ REQUEST FOR PRODUCTION NO. 16.: Draft Conduct Standards:** All documents
19 related to member conduct standards, codes of conduct, or similar policies that have been
created, proposed, or discussed by the governance and bylaws committee.

20 **RESPONSE:**

21

22

23 **☐ REQUEST FOR PRODUCTION NO. 17.: Expert Advice Documents:** All
24 communications, reports, and documents related to any advice, consultation, or services provided
25 by experts, consultants, or legal advisors to the governance and bylaws committee regarding the
reform of the Swedish Club's governance, bylaws, or member conduct standards, excluding
26 privileged attorney-client communications.

27 **RESPONSE:**

28

1 ☐ **REQUEST FOR PRODUCTION NO. 18.: Termination Discussions Documents:** All
2 documents related to any discussions or considerations by the governance and bylaws committee
3 regarding the termination of members' memberships, including but not limited to the termination
4 of Elizabeth A. Campbell's or any other member's membership.

5 **RESPONSE:**

6 ☐ **REQUEST FOR PRODUCTION NO. 19.: Formation Reasons Documents:** All
7 documents related to the decision to form the governance and bylaws committee, including but
8 not limited to board meeting minutes, emails, and memoranda discussing the need for such a
9 committee.

10 **RESPONSE:**

11 ☐ **REQUEST FOR PRODUCTION NO. 20.: Retroactive Changes Documents:** All
12 documents related to any proposed changes to the bylaws or policies that address or relate to past
13 actions taken by the Swedish Club, its board, or its officers, particularly concerning membership
14 terminations.

15 **RESPONSE:**

16 ☐ **REQUEST FOR PRODUCTION NO. 21.: Member Input Documents:** All documents
17 related to any input, feedback, or comments received from Swedish Club members regarding
18 proposed changes to the bylaws or member conduct standards, including but not limited to
19 surveys, emails, letters, and meeting notes.

20 **RESPONSE:**

21 ☐ **REQUEST FOR PRODUCTION NO. 22.: Termination Procedures Documents:** All
22 documents related to any discussions or proposals by the governance and bylaws committee
23 regarding procedures for terminating a member's membership.

24 **RESPONSE:**

1 ☐ **REQUEST FOR PRODUCTION NO. 23.: Other Relevant Documents:** Any and all other
2 documents not already produced in response to the above requests that relate to the activities of
3 the governance and bylaws committee.

4 **RESPONSE:**

5
6 ☐ **REQUEST FOR PRODUCTION NO. 24.: False Allegations Documents:** Produce all
7 documents, including but not limited to emails, letters, memoranda, and notes, that relate to the
8 false allegations made by the “former leader” as mentioned in the Board President’s Letter dated
9 February 2025.

10 **RESPONSE:**

11 ☐ **REQUEST FOR PRODUCTION NO. 25.:• Meeting Minutes on Allegations:** Produce all
12 minutes, agendas, recordings, and notes from meetings of the Swedish Club’s board of directors,
13 governance committee, or any other committees, from January 1, 2024, to the present, where
14 discussions took place regarding false allegations made by former members or leaders, or
15 regarding the content of the Board President’s Letter dated February 2025.

16 **RESPONSE:**

17 ☐ **REQUEST FOR PRODUCTION NO. 26.: Communications on Lawsuit:** All documents
18 related to communications between Langdon Miller and other members of the Swedish Club’s
19 board of directors regarding the lawsuit filed by Elizabeth A. Campbell, excluding privileged
20 attorney-client communications.

21 **RESPONSE:**

22
23 ☐ **REQUEST FOR PRODUCTION NO. 27.: Committee Formation Documents:** All
24 documents related to the decision to form the governance and bylaws committee, including any
25 references to the lawsuit filed by Elizabeth A. Campbell.

26 **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 - LANGDON MILLER

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 LANGDON MILLER 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

Attorney for Defendant Alaimo, Albright,
Emerson, Faino, M. Johansson, Norgren,
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