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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  
MARY EMERSON**

25 TO: Defendant Mary Emerson:

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 MARY EMERSON – 1

Elizabeth A. Campbell, MPA  
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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

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

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

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

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

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

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

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

c. “Is Kristine not the reason you no longer work there? How quickly you forget that 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."<sup>1</sup>

3 10.

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

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

9 13. "**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  
11 company), dates at each address, e-mail address(es), and current phone numbers (work, mobile,  
12 fax).

13 Dated this 16th Day of April, 2025

14 ELIZABETH A. CAMPBELL, MPA

15 

16 Elizabeth A. Campbell, MPA

17 Plaintiff Pro Se

18 3826 24<sup>th</sup> Ave W

19 Seattle, WA 98199

20 Tel/Text: 206-769-8459

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22 neighborhoodwarrior@gmail.com

23  
24  
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26  
27  
28  

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<sup>1</sup> 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,<sup>2</sup> 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

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<sup>2</sup> 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:**

10  
11 ☐ **INTERROGATORY NO. 11.: Resignation:** State the date you resigned from the Swedish  
12 Club Board of Directors and provide a detailed explanation of all reasons for your resignation.

13 **ANSWER:**

14  
15 ☐ **INTERROGATORY NO. 12.: Resignation:** Did you discuss Elizabeth Campbell's  
16 lawsuit, membership status, employment termination, or alleged mistreatment with other board  
17 members during your tenure? If so, provide details, including dates and participants.

18 **ANSWER:**

19  
20 ☐ **INTERROGATORY NO. 13.: Resignation:** Describe any events, actions, or  
21 communications involving Kristine Leander, Elizabeth Norgren, or other board members that  
22 contributed to your decision to resign, including specific dates and details.

23 **ANSWER:**

24  
25 ☐ **INTERROGATORY NO. 14.: Resignation:** Did you raise concerns or express  
26 dissatisfaction with the Swedish Club's operations management, cultural programming,  
27 financial transparency, financial management or decisions, board governance to any individual  
28 prior to resigning? If so, identify the recipients and summarize the discussions.

**ANSWER:**

1  
2 **☐ INTERROGATORY NO. 15.: Resignation:** Describe any communications you had with  
3 other resigned board members (e.g., Shama Albright, Anna Faino, Neil Snyder, Ib Odderson,  
4 Martin Johansson) regarding your resignation or their resignations.

5 **ANSWER:**  
6

7 **INTERROGATORY NO. 16.: Attendance and Discussions at April 6, 2022 Board Meeting**

8 Did you attend the Swedish Club board meeting on April 6, 2022? If yes, please describe in  
9 detail what was discussed regarding Elizabeth Campbell's candidacy for the board during that  
meeting, including any decisions made or actions taken.

10 **ANSWER:**  
11

12 **INTERROGATORY NO. 17.: Vote on Bylaw Amendments**

13 During the April 6, 2022 board meeting, did you vote on any amendments to the Swedish Club  
14 bylaws? If yes, please state how you voted on each amendment and provide your reasons for  
voting that way, particularly in relation to Elizabeth Campbell's candidacy.

15 **ANSWER:**  
16

17 **INTERROGATORY NO. 18.: Communications Regarding Prevention of Election**

18 From September 1, 2021 to April 30, 2022, did you have any communications with Kristine  
19 Leander, Vi Reno, Sharon Lucas, or any other board members regarding preventing Elizabeth  
20 Campbell from being elected to the board? If yes, please describe each such communication,  
including the date, method (e.g., email, phone), participants, and the substance of the  
21 communication.

22 **ANSWER:**  
23

24 **INTERROGATORY NO. 19.: Knowledge and Opinion of Gary Sund's Speech**

25 Were you aware that Gary Sund would deliver a speech on April 20, 2022, regarding Elizabeth  
26 Campbell's candidacy? If yes, please describe how you became aware of it and whether you had  
any input or discussions about the content of the speech. Additionally, what is your opinion of  
27 the statements made in that speech?

28 **ANSWER:**



1  
2  
3 **INTERROGATORY NO. 20.: Presence at March 1, 2023 Board Meeting**

4 Were you present at the Swedish Club board meeting on March 1, 2023? If yes, please provide  
5 a detailed account of what transpired during that meeting, particularly any incidents involving  
6 Elizabeth Campbell and Sharon Lucas.

7 **ANSWER:**

8 **INTERROGATORY NO. 21.: Role in Administrative Leave Decision**

9 What was your role in the decision to place Elizabeth Campbell on administrative leave on  
10 March 3, 2023? Please describe any discussions, meetings, or communications you had  
11 regarding this decision, including who initiated it and what information was considered.

12 **ANSWER:**

13 **INTERROGATORY NO. 22.: Role in Termination Decision**

14 What was your role in the decision to terminate Elizabeth Campbell's employment and  
15 membership on March 9, 2023? Please describe the process by which this decision was made,  
16 including any votes taken, the reasons provided for the termination, and your personal stance on  
17 the matter.

18 **ANSWER:**

19 **INTERROGATORY NO. 23.: Statements Made About Elizabeth Campbell**

20 Identify each and every statement you have made, whether oral or written, to any person,  
21 regarding Elizabeth A. Campbell's character, behavior, actions, or suitability for employment or  
22 membership from January 1, 2022, to the present. For each statement, provide:

- 23 • The date and time of the statement.
- 24 • The name and contact information of each person to whom the statement was made.
- 25 • The substance of the statement.
- 26 • The context in which the statement was made.
- 27 • Whether the statement was made in person, by phone, email, text, or other means.

28 **ANSWER:**

**INTERROGATORY NO. 24.: Awareness of Harassment Complaints**

1 Were you aware of any complaints or reports made by Elizabeth Campbell regarding  
2 harassment or discrimination she experienced at the Swedish Club? If yes, please describe each  
3 such complaint or report, including when it was made, to whom, and what actions, if any, you  
4 took in response.

5 **ANSWER:**

6 **INTERROGATORY NO. 25.: Interactions with Elizabeth Campbell**

7 Describe in detail any interactions you have had with Elizabeth Campbell from January 1, 2022,  
8 to the present, including but not limited to meetings, conversations, emails, or other  
9 communications. For each interaction, provide the date, location, participants, and a summary  
10 of what was discussed or occurred.

11 **ANSWER:**

12 **INTERROGATORY NO. 26.: Recording and Minute-Taking Process**

13 Describe in detail your process for recording Swedish Club board meetings, including how you  
14 make audio recordings, who operates the recording equipment when you are not present, how  
15 the recordings are stored, and how minutes are drafted and approved.

16 **ANSWER:**

17 **INTERROGATORY NO. 27.: Completeness of Records**

18 Are there any board meetings or committee meetings from January 1, 2022, to the present for  
19 which recordings or minutes are missing or incomplete? If yes, please identify each such  
20 meeting and explain why the records are missing or incomplete.

21 **ANSWER:**

22 **INTERROGATORY NO. 28.: Recording of Executive Sessions**

23 Do you record executive sessions of the Swedish Club board meetings? If yes, describe how  
24 these recordings are made, stored, and who has access to them. If not, explain why not and how  
25 the proceedings of executive sessions are documented.

26 **ANSWER:**

27 **INTERROGATORY NO. 29.: Role in Setting Meeting Agendas**

28 PLAINTIFF'S INTERROGATORIES AND  
RFPS TO DEFENDANT MARY EMERSON – 10

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neighborhoodwarrior@gmail.com

1 Describe your role in setting the agendas for Swedish Club board meetings from January 1,  
2 2022, to the present. Specifically, did you include or exclude any items related to Elizabeth  
3 Campbell? If so, explain why.

4 **ANSWER:**

5  
6 **REQUESTS FOR PRODUCTION**

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

11 **RESPONSE:**

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

16 **RESPONSE:**

17  
18 ☐ **REQUEST FOR PRODUCTION NO. - 3) Gossip Evidence:** All documents reflecting  
19 statements or gossip about Plaintiff made by Kristine Leander, other Defendants, Swedish Club  
20 employees or members, or third parties, as referenced in the Letter, including dates and  
21 recipients; from August 15, 2020 to the present.

22 **RESPONSE:**

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

28 **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) Defendant Resignation:** Produce all emails,  
25 text messages, or other written communications sent or received by you between January 1,  
26 2021, and the present relating to your resignation from the Swedish Club Board of Directors.

27 **RESPONSE:**

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2  
3 **□ REQUEST FOR PRODUCTION NO. 10) Defendant Resignation:** Produce a copy of  
4 your resignation letter or any written notice of resignation submitted to the Swedish Club,  
including any drafts thereof.

5 **RESPONSE:**  
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7

8 **□ REQUEST FOR PRODUCTION NO. 11) Defendant Resignation:** Produce all responses  
9 you received from board members, Swedish Club staff, or members regarding your resignation,  
whether in writing or electronic form.

10 **RESPONSE:**  
11  
12

13 **□ REQUEST FOR PRODUCTION NO. 12) Defendant Resignation:** Produce all  
14 communications between you and other board members from January 1, 2021, to the present  
15 discussing your resignation or the resignations of other board members.

16 **RESPONSE:**  
17  
18

19 **□ REQUEST FOR PRODUCTION NO. 13) Defendant Resignation:** Produce any  
20 documents, notes, or emails in your possession reflecting concerns about the Swedish Club's  
21 management, finances, or treatment of members/employees prior to your resignation.

22 **RESPONSE:**  
23

24 **REQUEST FOR PRODUCTION NO. 14.: Board Meeting Records:** Produce all minutes,  
25 agendas, audio recordings, video recordings, transcripts, notes, drafts of minutes, and any other  
26 records from all Swedish Club board meetings, including regular meetings, executive sessions,  
and Zoom meetings, from September 1, 2021, to the present. This includes recordings made by  
you or on your behalf when you were not present.

27 **RESPONSE:**  
28

1 **REQUEST FOR PRODUCTION NO. 15.: Communications Regarding Elizabeth**  
2 **Campbell:** Produce all communications (including emails, texts, letters, notes) in which you  
3 participated that mention or relate to Elizabeth Campbell from September 1, 2022, to the  
4 present.

5 **RESPONSE:**

6 **REQUEST FOR PRODUCTION NO. 16.: Documents Related to Bylaw Amendments:**  
7 Produce all documents related to the proposed and voted-upon amendments to the Swedish  
8 Club bylaws in April 2022, including drafts, emails discussing the amendments, and records of  
9 votes.

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 17.: Investigation and Termination Documents:**  
12 Produce all documents related to any investigation conducted regarding Elizabeth Campbell,  
13 the decision to place her on administrative leave, and the decision to terminate her employment  
14 and membership, including reports, witness statements, emails, and notes from meetings.

15 **RESPONSE:**

16 **REQUEST FOR PRODUCTION NO. 18.: Personal Notes and Records:** Produce any  
17 personal notes, diaries, journals, or other records you have that mention Elizabeth Campbell or  
18 the events leading to her termination.

19 **RESPONSE:**

20  
21 **REQUEST FOR PRODUCTION NO. 19.: Harassment and Discrimination Documents:**  
22 Produce all documents related to any complaints, reports, or investigations of harassment or  
23 discrimination at the Swedish Club from January 1, 2022, to the present, including those  
24 involving Elizabeth Campbell.

25 **RESPONSE:**

26 **REQUEST FOR PRODUCTION NO. 20.: Committee Meeting Records:** Produce all  
27 minutes, agendas, recordings, notes, drafts, and any other records from meetings of the  
28 Swedish Club's building & property committee, governance and bylaws committee, and  
finance committee from January 1, 2022, to the present, including but not limited to those that  
relate to personnel matters, employment decisions, membership issues, bylaw changes, or any  
other topics that may have impacted Elizabeth Campbell's employment or membership.

PLAINTIFF'S INTERROGATORIES AND  
RFPS TO DEFENDANT MARY EMERSON – 14

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**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 - MARY EMERSON

**CERTIFICATE OF SERVICE**

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

Brad Bigos, WSBA No. 52297  
Alexandro Lopez, WSBA No. 62867  
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☐ WA State App Courts' eFiling Portal

***Attorney for Defendant Swedish  
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K. Johansson, Lucas, Miller, and Sund***

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



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***Attorney for Def Matthiesen***

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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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