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

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

12 vs.

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

24 Defendants.

No. 23-2-25128-8 SEA

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

25 TO: Defendant Neil Snyder:

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

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

PLAINTIFF'S INTERROGATORIES AND
RFPS TO DEFENDANT NEIL SNYDER – 1

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

DEFINITIONS

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

1. **“DATE”** – Date/Time Period. Unless a specific date or time period is expressly stated in an interrogatory, the time period covered by the interrogatory shall, by default, be from January 1, 2017, to the present date of April 16, 2025.
2. **“DOCUMENTS”** means all hard copy and electronic writings of every kind including, but not limited to, the original and any copy of all records, e-mails, letters, correspondence, appointment books, diaries, files, notes, statements, memoranda, or minutes of meetings, photographs, video, conferences, telephone calls, receipts, written reports or opinions of investigators or experts, status reports, financial statements, audit reports, tax returns, estimates, inventories, contracts, agreements, articles of incorporation, bylaws, stock book, minute book, deed, security agreement, mortgage, deed of trust, title or other insurance policy, report, record, study, hand written note, map, drawing, working paper, chart, paper, draft, index, tape, microfilm, data sheet, data processing card, computer printout, computer program, check, bank statement, passbook, including information recorded and stored electronically, however produced or reproduced, within your possession or subject to your control, of which you have knowledge or to which you have or have had access, or of which any of your agents, attorneys, accountants or consultants have had knowledge.
3. **“DEFENDANT GROUP(S)”** means the groups of defendants and the defense counsel(s) that represent them:
Group 1: Kristine Leander (former Executive Director) and Toene Hayes (former staff accountant), represented by Karen Kalzer.
Group 2: The Swedish Club, Langdon Miller (current board president), Kris Johansson (board member), Sharon Lucas (member/volunteer), and Gary Sund (former board president), represented by Brad Bigos and Alex Lopez.
Group 3: Elizabeth Norgren (former Executive Director), Sarah Alaimo (former HR Director), Shama Albright (former board president), Mary Emerson (former board secretary), Anna Faino (former board vice president), Martin Johansson (former membership chair), Ib Odderson (former board member), Molly Olson Smith (former board vice president), and Neil Snyder (former board member), represented by Megan Starks and Sarah Tatischeff.
Group 4: Lars Matthiesen (club member), represented by Nicholas Larson and Miguel Mendez-Pintado.
4. **“IDENTIFY”**- Individuals. When used in reference to an individual person, parties, participants, or third parties, it 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.

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

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

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

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

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

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

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

28 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
attorneys, agents, employees, officers, representatives, adjusters, investigators, and any other
7 "person" who is in possession of information on your behalf.

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

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

11 **ANSWER:**

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

18 **ANSWER:**

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

25 **ANSWER:**

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

² On December 17, 2021

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

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

9 **ANSWER:**
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11 ☐ **INTERROGATORY NO. 11.: 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:**
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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:**
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20 ☐ **INTERROGATORY NO. 13.: Resignation:** Identify all individuals (by name, address, and
21 phone number, if known) who have knowledge of the events or statements referenced in the
22 Letter, including those related to Kristine Leander's actions toward Plaintiff; from August 15,
23 2020 to the present.

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

ANSWER:

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3 **NOTICE: INTERROGATORIES No. 15 to 28 are directed to You, Neil Snyder, and are**
4 **intended to apply to all defendants within your Defendant Group who are represented by**
5 **your shared counsel and who have filed joint or substantively identical answers and**
6 **affirmative defenses.**

7 ☐ **INTERROGATORY NO. 15.:** If any co-defendant within your Defendant Group asserts a
8 different position than the ones in DEFENDANTS ALAIMO, ALBRIGHT, EMERSON, FAINO, M.
9 JOHANSSON, NORGREN, ODDERSON, OLSON, AND SNYDER'S ANSWER TO PLAINTIFF'S
10 COMPLAINT IN CAUSE NUMBER 23-2-25195-4 SEA³, please identify that defendant or
11 defendants and specify the variance.

12 **ANSWER:**

13 **A. Interrogatories Addressing Denials**

14 **INTERROGATORY NO. 16.:** For each paragraph in the Complaint that you denied in your
15 169-page Answer, including but not limited to paragraphs 1.3 and 5.976,⁴ state the specific
16 factual basis for each denial. Include:

- 17 a) A detailed description of the facts supporting each denial.
18 b) The full name, contact information, and a summary of the knowledge of each witness who
19 can support your position.
20 c) The title, date, author, and current custodian of each document that supports your position.
21 *Note:* Given the Answer's length, please provide a complete list of all denied paragraph
22 numbers with your response to ensure all denials are addressed.

23 **ANSWER:**

24 **INTERROGATORY NO. 17.:** Regarding your denial of allegations in Complaint paragraphs
25 related to your roles, employment, or agency relationships (e.g., paragraphs in Section 4 of the
26 Complaint), describe in detail your roles, employment status, and any agency relationships
27 during the relevant period. Include:

- 28 a) The facts supporting your denial.
b) Identification of witnesses with knowledge of your roles or employment.
c) Identification of documents (e.g., employment contracts, board minutes) related to your
roles.

ANSWER:

³ King County Court Lead Case No. 23-2-25128-8, Dkt. Item No. 152

⁴ See Exhibit A attached and incorporated herein,

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3 **INTERROGATORY NO. 18.:** For each denial in your Answer to allegations related to
4 specific causes of action (e.g., paragraphs in Sections 11.2 through 84.3 of the Complaint),
5 identify the specific elements of each cause of action you contend are not met and the factual
6 basis for your position. Include:

- 7 a) The facts supporting your denial.
8 b) Identification of witnesses with knowledge of the alleged conduct.
9 c) Identification of documents (e.g., communications, incident reports) related to the alleged
10 conduct.
11 a) *Note:* Given the Answer's length, please provide a complete list of all denied cause of
12 action numbers with your response to ensure all denials are addressed.

13 **ANSWER:**

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B. Interrogatories Addressing Affirmative Defenses

INTERROGATORY NO. 19.: Regarding your affirmative defense of charitable immunity,
describe in detail the factual and legal basis for this defense, including:

- a) The specific statutory provisions you rely on.
b) How each PBFL Defendant qualifies for charitable immunity.
c) Identification of witnesses with knowledge of your charitable activities or roles.
d) Identification of documents (e.g., nonprofit filings, board resolutions) supporting this
defense.

ANSWER:

INTERROGATORY NO. 20.: Regarding your affirmative defense of independent,
intervening, and superseding acts, identify:

- a) Each independent, intervening, or superseding act or omission you contend caused
Plaintiff's alleged injuries.
b) The persons, parties, or entities responsible for these acts or omissions.
c) The dates and details of these acts or omissions.
d) Identification of witnesses with knowledge of these acts or omissions.
e) Identification of documents (e.g., incident reports, witness statements) supporting this
defense.

ANSWER:

1 **INTERROGATORY NO. 21.:** Regarding your affirmative defense of Plaintiff's preexisting
2 conditions, describe:

- 3 a) Each preexisting condition you contend Plaintiff had.
4 b) How each condition relates to Plaintiff's alleged injuries.
5 c) Identification of witnesses with knowledge of Plaintiff's preexisting conditions.
6 d) Identification of documents (e.g., medical records, prior complaints) supporting this
7 defense.

8 **ANSWER:**

9 **INTERROGATORY NO. 22.:** Regarding your affirmative defense of failure to mitigate
10 damages, describe:

- 11 a) Each specific action or omission by Plaintiff that you contend constitutes a failure to
12 mitigate.
13 b) The dates and details of these actions or omissions.
14 c) Identification of witnesses with knowledge of Plaintiff's alleged failure to mitigate.
15 d) Identification of documents (e.g., communications, medical advice) supporting this
16 defense.

17 **ANSWER:**

18 **INTERROGATORY NO. 23.:** Regarding your affirmative defense of allocation of fault under
19 RCW 4.22.070, identify:

- 20 a) Each person or entity (including non-parties) to whom you contend fault should be
21 allocated.
22 b) The percentage of fault you attribute to each.
23 c) The factual basis for allocating fault to each.
24 d) Identification of witnesses with knowledge of the fault of others.
25 e) Identification of documents (e.g., incident reports, witness statements) supporting this
26 defense.

27 **ANSWER:**

28 **INTERROGATORY NO. 24.:** Regarding your affirmative defense of misconduct of others,
describe:

- a) Each act of intentional misconduct by others that you contend caused Plaintiff's alleged
injuries.
b) The persons responsible for these acts.
c) The dates and details of these acts.
d) Identification of witnesses with knowledge of the misconduct.

- 1 e) Identification of documents (e.g., police reports, disciplinary records) supporting this
2 defense.

3 **ANSWER:**

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5 **INTERROGATORY NO. 25.:** Regarding your affirmative defense of failure to state a claim,
6 identify:

- 7 a) Each cause of action in the Complaint that you believe fails to state a claim.
8 b) The specific legal or factual deficiencies in each cause of action.
9 c) Identification of any witnesses with knowledge of the alleged deficiencies.
10 b) Identification of any documents (e.g., legal memoranda) supporting this defense.

11 **ANSWER:**

12 **C. Interrogatories Addressing Other Answers**

13 **INTERROGATORY NO. 26.:** For each paragraph in the Complaint where you stated that you
14 "lack sufficient knowledge to admit or deny," explain the efforts you made to obtain the
information necessary to admit or deny the allegations. Include:

- 15 a) The steps taken to investigate the allegations.
16 b) Identification of any persons or documents consulted in your investigation.
17 c) The reasons why you were unable to obtain sufficient knowledge.

18 **ANSWER:**

19 **INTERROGATORY NO. 27.:** For each paragraph in the Complaint where you admitted
20 allegations in part but denied others, specify which parts you admitted and which parts you
21 denied, and provide the factual basis for each denial. Include:

- 22 a) The facts supporting your denial of the denied portions.
23 b) Identification of witnesses with knowledge of the admitted and denied portions.
24 c) Identification of documents related to the admitted and denied portions.

25 **ANSWER:**

26 **INTERROGATORY NO. 28.:** Regarding your assertion that certain paragraphs do not contain
27 allegations directed at PBFL Defendants, explain why you believe these paragraphs do not
28 pertain to you and identify any facts or documents that support your position. Include:

- c) The specific reasons for your belief.
d) Identification of witnesses with knowledge of the matters in these paragraphs.

1 e) Identification of documents related to these paragraphs.

2 **ANSWER:**

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4 **REQUESTS FOR PRODUCTION**

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

9 **RESPONSE:**

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

14 **RESPONSE:**

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

20 **RESPONSE:**

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

26 **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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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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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:**
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13 ☐ **REQUEST FOR PRODUCTION NO. 12) Defendant Resignation:** Produce any
14 documents, emails, or notes in your possession reflecting concerns about the Swedish Club's
15 operations, finances, or treatment of Elizabeth Campbell during your tenure.

16 **RESPONSE:**
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19 **NOTICE: Requests for Production No. 13 to 26 are directed to You, Neil Snyder, and are**
20 **intended to apply to all defendants within your Defendant Group who are represented by**
21 **your shared counsel and who have filed joint or substantively identical answers and**
22 **affirmative defenses.**

23 ☐ **REQUEST FOR PRODUCTION NO. 13.:** If any co-defendant within your Defendant
24 Group asserts a different position than the ones in DEFENDANTS ALAIMO, ALBRIGHT,
25 EMERSON, FAINO, M. JOHANSSON, NORGREN, ODDERSON, OLSON, AND SNYDER'S
26 ANSWER TO PLAINTIFF'S COMPLAINT IN CAUSE NUMBER 23-2-25195-4 SEA⁵, please
27 identify that defendant or defendants and specify the variance.

28 **RESPONSE:**

⁵ King County Court Lead Case No. 23-2-25128-8, Dkt. Item No. 152

1 **A. Requests Addressing Denials**

2 ☐ **REQUEST FOR PRODUCTION NO. 14.:** Produce all documents supporting your denials
3 in the Answer to every paragraph in the Complaint, including but not limited to paragraphs 5.737
4 and 5.743, such as correspondence, meeting minutes, witness statements, or any other records
5 referenced across the 169-page Answer.

6 **RESPONSE:**

7 ☐ **REQUEST FOR PRODUCTION NO. 15.:** Produce all documents related to your roles,
8 employment, or agency relationships with the Swedish Club or Lane Powell, P.C., as referenced
9 in your denials in the Answer (e.g., paragraphs in Section 4 of the Complaint), including
10 employment contracts, board minutes, or communications.

11 **RESPONSE:**

12 ☐ **REQUEST FOR PRODUCTION NO. 16.:** Produce all documents supporting your denials
13 in the Answer to allegations related to specific causes of action (e.g., paragraphs in Sections 46
14 through 54 of the Complaint), including any records or communications related to the alleged
15 conduct.

16 **RESPONSE:**

17 **B. Requests Addressing Affirmative Defenses**

18 ☐ **REQUEST FOR PRODUCTION NO. 17.:** Produce all documents supporting your
19 affirmative defense of charitable immunity, including nonprofit filings, board resolutions, or
20 legal opinions related to your charitable status.

21 **RESPONSE:**

22 ☐ **REQUEST FOR PRODUCTION NO. 18.:** Produce all documents supporting your
23 affirmative defense of independent, intervening, and superseding acts, including incident reports,
24 witness statements, or communications related to the alleged acts or omissions.

25 **RESPONSE:**

1 ☐ **REQUEST FOR PRODUCTION NO. 19.:** Produce all documents supporting your
2 affirmative defense of Plaintiff's preexisting conditions, including medical records, prior
3 complaints, or witness statements related to Plaintiff's health or prior injuries.

4 **RESPONSE:**

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6 ☐ **REQUEST FOR PRODUCTION NO. 20.:** Produce all documents supporting your
7 affirmative defense of failure to mitigate damages, including communications, medical advice,
8 or records showing Plaintiff's actions or omissions.

9 **RESPONSE:**

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11 ☐ **REQUEST FOR PRODUCTION NO. 21.:** Produce all documents supporting your
12 affirmative defense of allocation of fault under RCW 4.22.070, including records of fault by
13 others, witness statements, or incident reports.

14 **RESPONSE:**

15
16 ☐ **REQUEST FOR PRODUCTION NO. 22.:** Produce all documents supporting your
17 affirmative defense of misconduct of others, including police reports, disciplinary records, or
18 witness statements related to the alleged misconduct.

19 **RESPONSE:**

20 **C. Requests Addressing Other Answers**

21 ☐ **REQUEST FOR PRODUCTION NO. 23.:** Produce all documents supporting your
22 affirmative defense of failure to state a claim, including legal memoranda or analyses showing
23 why Plaintiff's claims are deficient.

24 **RESPONSE:**

25
26 ☐ **REQUEST FOR PRODUCTION NO. 24.:** Produce all documents related to your efforts to
27 investigate the allegations in Complaint paragraphs where you stated you "lack sufficient
28 knowledge to admit or deny," including notes, emails, or records of consultations with persons or
documents.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 25.:** Produce all documents related to the admitted portions of Complaint paragraphs where you partially admitted and partially denied allegations, including any records or communications supporting the admitted facts.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 26.:** Produce all documents supporting your assertion that certain paragraphs in the Complaint do not pertain to you, including any records or communications related to the matters in those paragraphs.

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 - NEIL SNYDER

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 NEIL SNYDER via the method indicated below and addressed to the following:

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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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